

July 2005

U.S. POSTAL
SERVICE

Guidance on
Suspicious Mail Needs
Further Refinement



Report Documentation Page

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Highlights

Highlights of [GAO-05-716](#), a report to the Ranking Minority Member, Committee on Homeland Security and Governmental Affairs, U.S. Senate

Why GAO Did This Study

In October 2003, an envelope marked "Caution: Ricin Poison" was discovered at an airmail facility in Greenville, South Carolina. Ricin is a poison that, in certain forms, can cause death. The U.S. Postal Service has emphasized to its employees to be on the alert for "suspicious mail" that may pose a threat and has developed guidance for them on how to identify and respond to such mail, in order to protect them from harm. Postal inspectors and emergency responders help in the responses to suspicious mail by performing an initial assessment of the threat it poses.

This report describes (1) actions taken by various agencies, in responding to the incident, to protect the health of postal employees and the public; (2) Postal Service guidance related to suspicious mail in place in October 2003 and the extent to which it was followed during the incident; and (3) subsequent changes made in this guidance and the extent to which current guidance addresses issues raised by the incident.

What GAO Recommends

GAO is making recommendations to further improve the Postal Service's guidance related to suspicious mail, to help ensure that postal personnel are prepared to respond to future incidents. The Postal Service indicated that it generally agreed with these recommendations and will take action on them.

www.gao.gov/cgi-bin/getrpt?GAO-05-716.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Katherine Siggerud at (202) 512-2834 or siggerud@gao.gov.

July 2005

U.S. POSTAL SERVICE

Guidance on Suspicious Mail Needs Further Refinement

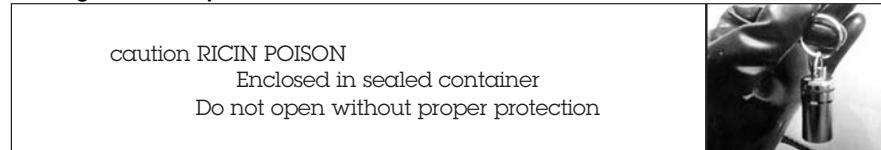
What GAO Found

Postal Service personnel identified the envelope in question as suspect and took some initial actions in response, such as moving it to a room away from employees. However, personnel did not speak with postal inspectors or emergency responders about the envelope until 12 hours after its discovery. Subsequently, a multiagency response took place. Key efforts included testing of the envelope and its contents, monitoring the health of employees and the public, sampling the facility for contamination, and communicating information to employees and unions.

At the time of the 2003 incident, the Postal Service had in place several guidelines on identifying and responding to suspicious mail—which emphasized steps to take, such as not moving an identified envelope or package, to protect employees. However, during the response, postal personnel did not fully follow this guidance, and a lack of consistency and clarity in the guidance may have been a contributing factor. For example, the instructions in the suspicious mail guidelines were not consistent, and it was not clear whether one guideline applied to nonanthrax scenarios. In addition, the Postal Service had some guidance on communicating with employees and unions regarding suspicious mail incidents, and its efforts to inform them about this incident generally followed this guidance. However, a lack of specific instructions on who should provide and receive information and when may have contributed to some communications issues that arose.

Since the incident, the Postal Service has made a number of changes in its guidance that have improved its consistency and clarity. For example, it issued new, simpler uniform guidelines on identifying and responding to suspicious mail and has emphasized these guidelines in monthly talks to employees. However, current guidance does not fully address issues raised by the incident because some key elements are lacking. For example, training for managers does not present all the guidance they may need to decide whether a piece of mail is indeed suspicious and response actions are warranted. Also, the Postal Service has not provided managers with explicit guidance on communicating with employees and unions regarding suspicious mail incidents. Such guidance is important to ensure that employees and unions are kept informed, particularly when a mail piece is suspected of posing a biological or chemical threat and is sent for testing.

Message on envelope and vial found inside



Sources: GAO (left graphic) and FBI (right photograph).

The envelope had a warning message typed on the outside. Inside was a sealed vial containing a substance that tested positive for ricin.

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Abbreviations

Three Ps	Package, People, and Plan
CDC	Centers for Disease Control and Prevention
DHS	Department of Homeland Security
FBI	Federal Bureau of Investigation
IEMP	Integrated Emergency Management Plan
JTTF	Joint Terrorism Task Force
SLAP	Shape, Look, Address, and Packaging
USPS	United States Postal Service

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United States Government Accountability Office
Washington, D.C. 20548

July 19, 2005

The Honorable Joseph I. Lieberman
Ranking Minority Member
Committee on Homeland Security and Governmental Affairs
United States Senate

Dear Senator Lieberman:

In fall 2001, five persons died from inhalation anthrax contracted from contaminated letters delivered through the U.S. mail system.¹ After the anthrax attacks, the frequency of incidents involving suspicious packages or powder spills increased dramatically, due partly to anthrax hoaxes as well as concerns over leakages from mail that had previously been handled routinely. Since October 2001, over 16,000 such incidents have occurred at postal facilities. These incidents have posed a challenge to the U. S. Postal Service (USPS) as well as to law enforcement and public health agencies at all levels of government. The Postal Service has emphasized to its employees to be on the alert for "suspicious mail" that may pose a threat and has developed guidance for them on how to identify and respond to such mail, in order to protect them and the public from potential harm. Suspicious mail consists of envelopes or packages that have characteristics that indicate they may have dangerous contents, such as a bomb, a radiological substance, or a biological or chemical agent.² The Postal Service has made a commitment to continuously improve its processes related to anthrax and other biohazards, including its guidance for identifying and responding to suspicious mail.

In October 2003, an envelope marked "Caution: Ricin Poison" was discovered at an airmail facility in Greenville, South Carolina. Ricin is a biotoxin derived from castor beans that, in certain forms, can cause death

¹We have issued a number of reports on the response to these incidents. See, for example, *GAO, U.S. Postal Service: Better Guidance Is Needed to Ensure an Appropriate Response to Anthrax Contamination*, [GAO-04-239](#) (Washington, D.C.: Sept. 9, 2004); *U.S. Postal Service: Better Guidance Is Needed to Improve Communication Should Anthrax Contamination Occur in the Future*, [GAO-03-316](#) (Washington, D.C.: Apr. 7, 2003); and *Bioterrorism: Public Health Response to Anthrax Incidents of 2001*, [GAO-04-152](#) (Washington, D.C.: Oct. 15, 2003).

²Biological agents are microorganisms capable of causing disease or toxins derived from a living organism. Chemical agents are poisonous vapors, aerosols, liquids, or solids that have toxic effects.

within 36 to 72 hours after exposure. Agencies involved in responding to the October 2003 incident included the Postal Service, the South Carolina Department of Health and Environmental Control, the Centers for Disease Control and Prevention (CDC), the Department of Homeland Security (DHS), and the Federal Bureau of Investigation (FBI). In November 2003, an envelope containing a substance initially suspected of being ricin was discovered at a White House mail processing facility.³

Citing concerns about the responses to the October and November 2003 incidents, particularly the timing of response actions, you asked us to examine these responses. As agreed with your staff, we plan to issue a separate report on the November 2003 incident later this year. To provide you with information on the response to the October 2003 incident, we focused on the following questions:

- In responding to the incident, what actions did the Postal Service, CDC, and other agencies take to protect the health of postal employees and the public, and when did they take these actions?
- During the incident, what Postal Service guidance for identifying and responding to suspicious mail was in place, and to what extent were actions by postal personnel in accordance with this guidance?
- What changes has the Postal Service made in this guidance since the incident, and to what extent does current guidance address issues raised by the incident?

To address these questions, we interviewed federal and state officials involved in the response to this incident and obtained and reviewed agency documents to determine the roles and response actions of the agencies involved. We also analyzed Postal Service guidance in place at the time that was related to suspicious mail, including guidance on identifying suspicious mail and taking initial response actions; procedures for identifying, handling, and responding to hazardous materials in the mail; and Postal Service guidance on communicating with employees and unions that could pertain to suspicious mail incidents. We compared actions taken by postal personnel during the incident with this guidance. We also interviewed union officials representing workers at the Greenville airmail

³In addition, in February 2004, a powder identified as ricin was discovered in a Senate office building mailroom.

facility to obtain their perspective on response actions by postal personnel. In analyzing whether actions taken by postal personnel were in accordance with existing guidance, we focused on actions taken from the initial discovery of the envelope until its removal from the facility, except for communications with employees and unions, which we covered until final testing results on the envelope and its contents were available. We reviewed current and planned Postal Service guidance related to suspicious mail and compared it with guidance in place during the incident to identify changes and the extent to which current guidance addresses issues raised by the incident. To assist in this analysis, we reviewed previous GAO work regarding the anthrax incidents, pertinent literature and previous GAO work on risk management and risk communications, and guidance produced by CDC, the General Services Administration, and others on mail security and responding to biological threats in the mail. We performed our work from June 2004 through May 2005 in accordance with generally accepted government auditing standards. Further details about our scope and methodology appear in appendix I.

Results in Brief

The Postal Service and other agencies took a number of actions to protect the health of postal employees and the public after the envelope in question was discovered at the airmail facility in Greenville on October 15, 2003. Postal personnel identified the envelope as suspect shortly after midnight and took some initial actions in response, including moving it to a room away from employees and double-bagging it. The manager of the facility called postal inspectors, who are responsible for initially assessing the threat posed by suspicious mail, after arriving at work the following morning, but did not speak with an inspector until about 12 hours after the envelope had been discovered. The manager called emergency responders shortly thereafter based on the inspector's advice. Law enforcement officers conducted a threat assessment, and then immediately transported the bagged envelope to a law enforcement laboratory for further assessment. This assessment revealed that a metal vial was inside the envelope. On the morning of October 16, a laboratory of the South Carolina health department received the envelope and vial for testing. This laboratory determined that the risk of exposure was low because the vial was well-sealed, and it conducted some initial tests of the substance inside the vial. However, the laboratory did not have the capability to test for ricin at that time and agreed with CDC to send a sample to CDC for testing on the following Monday, October 20, so that the sample would not arrive during the weekend. CDC received the sample on October 21 and, on that same day, performed tests for ricin and determined that ricin was present

in the substance. Subsequently, various federal and state agencies cooperated in developing and implementing the response, which included monitoring the health of employees and the public, sampling the facility, and communicating information to employees and unions. Samples taken at the facility tested negative for ricin, and the public health response ended on October 29, with no confirmed cases of ricin exposure.

In October 2003, the Postal Service had in place several guidelines on identifying and responding to suspicious mail, but postal personnel did not fully follow this guidance during the initial response to the discovery of the envelope. A lack of consistency and clarity in this guidance, as well as a lack of clarity in some related procedures, may have been a contributing factor for their actions. For example, the instructions in the suspicious mail guidelines were not consistent, and the types of situations they applied to may not have been clear to employees. In addition, the Postal Service had related procedures for identifying and handling routine mail containing hazardous materials that cited some characteristics to identify this type of mail that were similar to characteristics of suspicious mail. During the incident, although the envelope had some characteristics of suspicious mail, personnel initially followed the procedures for handling mail containing hazardous material because such mail typically has warning labels and the message on the envelope appeared to constitute such a warning label. However, these hazardous material procedures do not instruct postal personnel to take some precautions, such as not handling the mail piece and calling postal inspectors first in all instances, which are recommended in the suspicious mail guidance and are designed to protect employees. In October 2003, the Postal Service also had some guidance in place on communicating with employees and unions regarding suspicious mail incidents and its efforts to inform them about this incident generally followed this guidance. However, a lack of specific instructions in this guidance—on who should provide and receive information and when information should be provided—may have contributed to some communications issues that arose. For example, union officials cited concerns that local unions were not notified until 7 days after the discovery of the envelope, after testing results were available.

Since the incident in Greenville in October 2003, USPS has made a number of changes in its guidance on identifying and responding to suspicious mail that have improved its consistency and clarity, therefore addressing some of the issues raised by the incident. For example, the Postal Service has sought to clarify the process for identifying and responding to suspicious mail and raise employee awareness of this process by developing and

issuing new simpler and standardized guidance. A main goal of this effort has been to ensure that employees are protected from possible biological and chemical threats in the mail. However, current guidance does not fully address issues raised by the incident because some key elements are lacking. In particular, the Postal Service has not provided guidance to employees on actions to take if a mail piece has characteristics of both suspicious mail and mail containing hazardous material. It has also not provided training for managers and supervisors on suspicious mail that presents all the guidance they may need to make appropriate decisions. Without this additional guidance, postal personnel may have difficulty in some cases, as occurred in the Greenville incident, in deciding whether a mail piece is suspicious and whether response actions, such as shutting down equipment and calling postal inspectors, are warranted. Furthermore, the Postal Service has not provided explicit guidance to its managers on communicating with employees and unions regarding suspicious mail incidents. Such communications are particularly important in instances in which mail suspected of containing a biological or chemical agent is sent for testing. Without such guidance, employees and unions may not receive timely information regarding the situation and may not feel confident that they have been adequately informed.

We are making several recommendations to further improve the Postal Service's guidance related to suspicious mail, to help ensure that postal personnel are prepared to respond to future incidents involving mail that may contain biological or chemical agents. Specifically, we are recommending that the Postal Service (1) provide guidance to employees on the response actions to take in the event a mail piece has characteristics of both suspicious mail and mail containing hazardous material, (2) expand its training for managers and supervisors on suspicious mail, and (3) provide more explicit guidance to managers on communicating with employees and unions regarding incidents in which a mail piece is sent for testing.

We requested comments on a draft of this report from the Postal Service, CDC, DHS, the FBI, and the two postal unions that represent employees of the Greenville airmail facility (the American Postal Workers Union and the National Postal Mail Handlers Union). The Postal Service provided written comments generally agreeing with our recommendations and said that, in response, it intends to implement a number of improvements in its suspicious mail guidance, including expanded training for employees. These comments are reprinted in appendix II. The Postal Service also provided some technical comments, which we incorporated. The FBI

provided technical comments, which we incorporated. DHS, CDC, and the postal unions did not provide comments on the draft.

Background

Ricin is a poison derived from the beans of the castor plant.⁴ Exposure to ricin in high enough doses can cause organ failure and death. Initial symptoms may develop within 8 hours of exposure. There is currently no approved treatment or cure, such as an antidote, for ricin exposure in humans. However, the symptoms can be managed with medical intervention, such as respiratory support, if they are recognized early and the dose is not lethal.

The Greenville, South Carolina-airmail facility where the envelope marked “ricin” was discovered in October 2003 is part of the national postal network of USPS. This network includes thousands of facilities across the United States that process and distribute mail, as shown in table 1. USPS processes and distributes over 200 billion pieces of mail annually.

Table 1: USPS Facilities

Facility type	Number	Description
Processing and Distribution Centers and Facilities	348	Process and dispatch incoming and outgoing mail for a designated service area
Airmail Centers and Facilities	78	Receive, distribute, and dispatch mail transported principally by air
Bulk Mail Centers	21	Process and distribute bulk standard mail and parcels
Priority Mail Processing Centers	12	Process priority mail
Post Offices, Stations, and Branches	37,159	Collect, distribute, and deliver mail

Source: USPS.

⁴Ricin is considered to be a biological agent because it is derived from a plant, but also a chemical agent because it is a toxin that causes cell death and symptoms similar to those caused by chemical agents. Ricin appears on CDC's select agent list. CDC worked with representatives of several countries, U.S. intelligence officials, and safety professionals to establish this list of 42 viruses, bacteria, toxins, and other agents considered to have the potential to pose a severe threat to public health and safety.

The Postal Inspection Service (Inspection Service) provides for the security of the mail and the enforcement of federal postal laws. The service employs approximately 1,900 fact-finding and investigative postal inspectors and 950 uniformed postal police officers. In the years since the anthrax attacks, the service—along with USPS as a whole—has faced the challenge of responding to a large increase in suspicious mail incidents that have caused disruptions of postal operations. In fiscal year 2002, when the Inspection Service began systematically collecting statistics on suspicious mail incidents, about 13,500 such incidents occurred at postal facilities. Subsequently, the number of such incidents significantly declined, to about 800 in fiscal year 2003 and 1,500 in fiscal year 2004. According to postal officials, these incidents have often involved leakages of routine substances, such as sand or talcum powder, from mail pieces.

Since the anthrax attacks in the fall of 2001, the Postal Service has made a number of efforts to manage risks posed to the mail system by biological and chemical agents, such as anthrax and ricin.⁵ A main effort has been developing additional guidelines for employees on identifying and responding to suspicious mail, including mail that may pose a biological or chemical threat. Other main efforts include

- developing an “all-hazards” emergency response plan for managing natural and man-made emergencies;
- installing biohazard detection systems at some processing facilities and developing and implementing related procedures and training of personnel;⁶ and
- creating an Emergency Preparedness Office and deploying emergency managers at some USPS facilities.

When an incident involving suspicious mail occurs at a USPS postal facility, personnel at the affected facility may contact postal inspectors, local police, and local fire department hazardous materials units for assistance.

⁵GAO has designated risk management as an emerging challenge for the federal government. See GAO, *High-Risk Series: An Update*, GAO-05-207 (Washington, D.C.: January 2005) and *21st Century Challenges: Reexamining the Base of the Federal Government*, GAO-05-325SP (Washington, D.C.: February 2005).

⁶Biohazard detection systems are automated detection systems that analyze air samples collected as mail moves through processing machines.

In addition, depending on the circumstances and severity of the incident, state and local health authorities, the FBI, and CDC might become involved. These local, state, and federal entities each conduct activities according to their function, such as threat assessments and criminal investigations, testing to identify unknown biological substances, and health surveillance of potentially exposed persons. In certain circumstances, such as when more than one federal agency is involved in the response, DHS becomes involved and coordinates the federal response.

USPS, the State Health Department, and CDC Took Actions to Protect the Health of Employees and the Public

Following the discovery at the Greenville airmail facility of the envelope marked “Caution: Ricin Poison” shortly after midnight on October 15, 2003, the Postal Service and other agencies took a number of response actions to protect the health of postal employees and the public. (See fig. 1.) Postal personnel took some initial actions, including isolating the envelope in a room away from employees, double-bagging it, and calling the Inspection Service. However, the facility manager did not speak with an inspector until about noon on that day, and called emergency responders shortly after, based on the inspector’s advice. Local law enforcement and fire department personnel responded, along with members of an FBI joint terrorism task force (JTTF) and a postal inspector.⁷ A threat assessment was conducted and the bagged envelope was then immediately transported to a law enforcement laboratory for further assessment. This assessment revealed that a metal vial was inside the envelope. On the morning of October 16, a laboratory of the South Carolina health department received the envelope and vial for testing. This laboratory determined that the risk of exposure was low, because the vial was well-sealed, and conducted some initial tests of the substance inside the vial. However, the laboratory did not have the capability to test for ricin at that time and agreed with CDC to send a sample to them for testing on Monday, October 20, so that the sample would not arrive during the weekend. CDC received the sample on October 21 and, on that day, confirmed that ricin was present in the substance. Subsequently, various federal agencies, as well as the state health department, coordinated in developing and implementing the response. CDC conducted sampling at the facility and found no evidence of ricin contamination. The state health department and CDC monitored the health of employees and the public and found no cases of ricin exposure.

⁷Joint terrorism task forces, under the leadership of the FBI, are comprised of local, state, and federal officers and agents, and are responsible for responding to suspected acts of terrorism.

Finally, the facility manager briefed employees on the incident on October 15 and Postal Service headquarters prepared talks on the testing results, which were delivered to employees and unions on October 22 and 23.

Figure 1: October 2003 Timeline of Greenville Incident

<h1>October</h1> 2003						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
(12)	(13)	(14)	(15) Midnight: Employee finds envelope at the facility. Noon: Manager speaks with postal inspector about the envelope and then calls emergency responders. Early Afternoon: Local police and fire department arrives along with FBI JTTF and a postal inspector. Envelope is immediately taken to a law enforcement lab. ^a Employees are informed about the incident as they report to work.	(16) Morning: State health department lab receives the envelope for testing and determines that there is a low risk of exposure because the vial inside of the envelope is well-sealed. Lab could not test for ricin at that time but begins testing of substance inside the vial for a number of other agents. Preliminary test results are shared with CDC.	(17) State lab agrees with CDC to send a sample of the substance to CDC for ricin testing on Monday.	(18)
(19)	(20) State lab finishes its testing and sends sample of the substance to CDC.	(21) Morning: CDC receives sample of the substance and conducts tests for ricin. Afternoon: Results of the test indicate the presence of ricin toxin. Late Afternoon: Conference calls held among CDC, DHS, FBI, the state lab, and USPS. State public health officials alerted area hospitals to be on the lookout for potential ricin exposures.	(22) Afternoon: Conference calls held among CDC, DHS, FBI, and USPS. Mail processing stops. State health officials talk to employees to check for symptoms and answer questions. USPS gives a talk to Greenville employees with CDC, FBI, Inspection Service, and state health officials present. Evening: USPS issues information to all employees on the incident.	(23) Early Morning: CDC collects samples from the facility. Afternoon: CDC reports that all samples tested negative for ricin. Evening: USPS announces to employees that the sampling of the facility is negative for ricin.	(24) Afternoon: Facility returns to normal operations. State and local public health officials continue active surveillance of local hospitals for symptoms of ricin exposure, with assistance from CDC.	(25)
(26)	(27)	(28)	(29) Public health response ends with no reported cases of ricin poisoning.	(30)	(31)	

Source: GAO analysis of USPS, Inspection Service, FBI, South Carolina Department of Health and Environmental Control, CDC, and DHS data.

^aThe envelope had previously been double-bagged by postal personnel.

USPS Personnel Discovered and Initially Responded to the Suspicious Envelope on October 15

About 12:15 a.m., on October 15, 2003, an employee at a postal airmail facility in Greenville, South Carolina, discovered a standard business size envelope, measuring 4 inches by 9 inches, on a mail processing machine. The employee noticed that the envelope bore only a written warning on the outside of the envelope and had no postage, addressee or zip code, or return address. (See fig. 2.)

Figure 2: Message on the Envelope



Source: GAO graphic based on an FBI photo.

Note: GAO re-created the original photo provided by the FBI in order to optimize the appearance of the image.

The employee removed the envelope from the mail processing machine, set the envelope aside on a tray and finished processing the bundle of mail that had accompanied the envelope. Within 10 minutes after discovering the envelope, the employee took the tray containing the envelope to the shift supervisor who was at the supervisory console, which was situated between 30 and 40 feet away from the employee's workstation.

Being cautious and a bit uncertain, the supervisor had the area cordoned off with orange cones and tape, and decided to evacuate the facility. At 12:30 a.m., he instructed the 20 employees in the building to evacuate the facility and called the facility manager at home around 12:40 a.m. During the phone call, the facility manager asked the shift supervisor if the envelope was damaged, showed visible signs of leakage, and whether suspicious odors were present. The shift supervisor told the manager that the envelope did not exhibit any of these characteristics. According to the facility manager, the supervisor instructed the employee who had discovered the envelope to wash her hands.

The facility manager told us that, at the outset, nobody knew exactly what ricin was and, during the telephone conversation, the shift supervisor suggested that it might be rat poison. At the instruction of the facility manager, the tray containing the envelope was removed from the workroom and put into the conference room next to the facility manager's office. Shortly thereafter, the evacuation was called off and employees

returned to work until the shift ended at approximately 4:30 a.m. that morning.

The Inspection Service and Emergency Responders Became Involved 12 Hours after the Discovery

About 7 hours after the envelope was first discovered, at around 7:30 a.m., the facility manager arrived at the facility. He inspected the envelope about 8:00 a.m. At around 8:10 a.m., he called the local safety officer, who advised him to contact the Inspection Service.⁸ The safety officer also called the postal service team responsible for responding to spills and leaks from a nearby larger facility and asked them to report to the facility. At approximately 9:00 a.m., this team arrived at the facility. Wearing protective gear, the team retrieved the envelope from the conference room, double-bagged it, and moved it to a secure room across the hall. The team then locked the door and placed “Do Not Enter” signs on the front.

Between 9:00 a.m. and noon, the facility manager placed a total of three calls to the Inspection Service, including two calls to the office in Greenville and one to the office in Charlotte, North Carolina. The facility manager made the first call about 9:00 a.m. to the Inspection Service office in Greenville. The inspector at the time was out responding to a robbery investigation, so the facility manager left a message. Later that morning, at 11:00 a.m., the facility manager placed another call to the Inspection Service, this time to the Charlotte office. Again, he was not able to reach an inspector, but instead left a message that a suspicious mail piece had been discovered in Greenville. According to the inspectors from Charlotte and Greenville, neither of these two messages indicated that the situation was urgent. According to the facility manager, he stated in his messages what was written on the envelope but probably mispronounced the word “ricin.”

At noon, about 12 hours after the envelope had been first discovered, the facility manager made another call to the Inspection Service office in Greenville. This time he spoke with an inspector, who advised him to call emergency responders. He did so, and at approximately 1:00 p.m., these responders, members of local law enforcement and the hazardous materials unit of the fire department, arrived at the facility. At 1:20 p.m. the fire department evacuated the building.

⁸USPS safety officers are responsible for monitoring and assessing safety hazards and potentially unsafe conditions, among other things.

At 1:50 p.m., an FBI agent and a county law enforcement officer, members of the FBI's Joint Terrorism Task Force in the Greenville area, responded to the incident.⁹ An inspector from the Greenville Inspection Service office arrived at about the same time. Law enforcement officials conducted a threat assessment, removed the bagged envelope from the facility, and immediately transported it to a law enforcement laboratory for further assessment. This assessment revealed that the envelope contained a metal vial and a threatening letter addressed to the Department of Transportation.¹⁰ (See fig. 3.)

⁹According to FBI officials, they were notified about the envelope by the U.S. Coast Guard's National Response Center. This center has agreements with various federal entities to make notifications regarding incidents meeting established criteria.

¹⁰The letter made reference to an April 2003 Department of Transportation regulation that increased the required number of hours that commercial truck drivers had to rest in between shifts from 8 to 10 hours, starting in January 2004. (68 Fed. Reg. 22456, Apr. 28, 2003)

Figure 3: Photo of the Sealed Vial Found Inside the Envelope



Source: FBI.

According to the Inspection Service, the following morning inspectors began tracking the path that the envelope may have taken before it was discovered in the facility. This was done to determine how the envelope arrived at the facility, whether it had possibly passed through another facility, and whether it had potentially exposed other postal employees or the public. However, the Inspection Service concluded that the envelope had been discovered before it entered the mail stream because it was not postmarked at the time of discovery.

According to USPS officials in Greenville, the facility manager and shift supervisor informed employees of the situation as they reported for the next work shift that afternoon. The facility manager told us that this information was communicated in a talk that supervisors deliver daily to employees and that normally consists of announcements regarding

operations. Also, according to the manager, he told employees to let him know if they showed any signs of illness, based on the advice of the FBI. The manager also told us that, sometime between October 15 and 21, he found information on ricin on CDC's Web site, printed copies of this information, and made them available to employees and union representatives. He told us that he also shared this information verbally with employees.

**Public Health Officials
Performed Tests from
October 16 to 21**

At approximately 10:00 a.m. on October 16, 2003, South Carolina Department of Health and Environmental Control's public health laboratory, part of the CDC's Laboratory Response Network, received the envelope, letter, vial and substance for testing.¹¹ Using a standard "all agents" testing approach, the laboratory tested for a number of agents, including anthrax, but did not have the capability at that time to perform tests for ricin. At this point of the response, CDC was serving as an advisory agency to the lab. On Friday, October 17, the state laboratory agreed with CDC to send a portion of the substance to CDC in Atlanta to test for ricin on the following Monday, October 20, 2003. The state lab completed its testing on October 20 and sent a sample of the substance to CDC on that date via overnight mail.

State laboratory officials told us that they did not send a sample of the substance to CDC for ricin testing earlier because they believed the risk of exposure was low, since the substance was contained in a well-sealed metal vial that would prevent any amount of the substance from escaping. The sealed nature of this vial led laboratory officials to assume that there was time to work with the substance and make a thorough and definitive assessment of what it was. The substance itself appeared to be in a form that could not easily be dispersed and there had been no reported symptoms of exposure to date. Also, CDC had asked the laboratory officials to send the sample to them via overnight mail on Monday rather than Friday, to ensure that it would be promptly received and tested upon arrival. CDC officials explained to us that had the public health threat been higher that they would have called up their staff to be present during the weekend to receive and test the sample.

¹¹The Laboratory Response Network is a national network of labs coordinated by CDC to respond to biological and chemical terrorism and other public health emergencies.

On October 21, at about 10:20 a.m., about 6 days after the envelope had first been discovered, CDC received the sample and began testing. Around 3:45 p.m., the CDC lab confirmed the presence of ricin toxin in the sample. CDC officials explained to us that, although the substance had tested positive for ricin, they believed that it posed a low public health risk because it was in a form that would be unlikely to affect employees who might have come in contact with the envelope. Also, it had been securely contained inside the metal vial and there was no sign of leakage.

**Multiple Agencies
Responded from October 21
to 29**

Following CDC's testing, various federal and state agencies held discussions, through teleconferences, to determine the appropriate response. The participants in these interagency teleconferences included officials of the Postal Service, the Inspection Service, CDC, DHS, FBI, and the South Carolina health department, as well as other South Carolina officials.¹² The first teleconference was held on October 21, 2003, at about 5:00 p.m. During this teleconference, USPS told participants that no illnesses among employees had been reported. In this teleconference and in subsequent ones later that evening and the following day, the participants discussed and agreed upon response actions to protect the health of postal employees and the public, including monitoring the health of facility employees and the public in the area to check for illnesses that could indicate ricin poisoning, sampling the facility to determine whether it had been contaminated, and communicating with postal employees about the situation. CDC officials explained to us that, although they believed that the substance that had been in the envelope did not pose a serious public health threat, the decisions to monitor the health of postal employees and the public and to sample the facility had been made in order to be prudent.

Mid-afternoon on October 22, the state and local health departments began interviewing employees at the Greenville airmail facility to check for symptoms of ricin exposure and to answer questions. CDC personnel were on hand to assist in this effort. At 3:00 p.m., mail processing at the facility stopped and no mail was allowed to leave the premises. At 6:00 p.m., a talk, prepared by USPS headquarters with the advice of CDC and the state health department, was given to Greenville postal employees informing them about the situation. This talk explained that the facility had been

¹²The FBI, with assistance from the Inspection Service and South Carolina law enforcement, conducted the investigation of this incident. This investigation was outside the scope of our review. According to the FBI, this investigation is still ongoing.

closed for testing and that the envelope that had been discovered on October 15 had contained a vial with a substance that had tested positive for ricin at CDC. This talk also stated that the vial had been well-sealed and that there had been no indications of employee exposures connected to the incident.

CDC, the state health department, the FBI, and the Inspection Service participated in the talk in Greenville and answered employee questions and concerns. Local union representatives were provided with the information in the talks prior to their delivery. The information in the Greenville talk was provided by USPS headquarters to all employees nationwide that evening and the following morning, in a news announcement and a talk for delivery to all employees.

In the early morning hours of October 23, 2003, CDC personnel collected swab and vacuum samples from the facility, sending them to CDC for analysis at approximately 6:30 a.m. About 3:30 p.m., CDC reported that all samples taken from the facility had tested negative for ricin. At 6:00 p.m., a talk, prepared by USPS headquarters, was provided to Greenville employees informing them of these results and that the facility would reopen on Friday, October 24, 2003. This talk emphasized appropriate steps to follow when encountering a suspicious package. USPS headquarters also provided this information to all employees nationwide in a news announcement issued about the same time. On October 24, 2003, the facility reopened for operations.

On October 21, after CDC reported its testing results, state public health officials alerted area hospitals, private practice physicians, and the state poison control center to be on the lookout for symptoms associated with ricin exposure. CDC also checked poison control center records to see if any cases that could indicate ricin poisoning had been reported. On October 22, state and local health officials, with assistance from CDC, interviewed all employees at the Greenville airmail facility to check for symptoms of ricin exposure. At that time, they determined that no employees had any health complaints that could be reasonably related to ricin exposure. In addition, the state health department and CDC conducted statewide monitoring for illnesses that could indicate ricin exposure and distributed a written description of ricin poisoning to area hospitals, emergency rooms and other health-care providers. Medical surveillance continued until October 29, 2003, approximately 14 days after the envelope was first discovered, with no confirmed cases of ricin exposure.

USPS Guidance Was Inconsistent and Unclear, and Response Did Not Fully Follow This Guidance

In October 2003, the Postal Service had in place several guidelines on identifying and responding to suspicious mail but these guidelines were not entirely consistent or clear. In addition, the Postal Service had procedures for identifying and handling routine mail containing hazardous materials that cited some characteristics to identify this type of mail that were similar to characteristics of suspicious mail. During the incident, postal personnel did not fully follow the suspicious mail guidelines and a contributing factor may have been the lack of consistency and clarity in these guidelines, as well as a lack of guidance on what to do if a mail piece has characteristics of both suspicious mail and mail containing hazardous material. For example, personnel initially followed the procedures for handling mail containing hazardous material because this type of mail typically has warning labels and the message on the envelope appeared to constitute such a warning label. However, these procedures do not instruct postal personnel to take some precautions, such as not handling the mail piece and calling postal inspectors first in all instances, which are recommended in the suspicious mail guidance. These precautions are designed to protect employees from exposure to possible biological or chemical threats and to obtain the early involvement of those with expertise who can assess the threat posed by a suspicious mail piece. Finally, the Postal Service had guidance on communicating with employees and unions regarding suspicious mail incidents. While efforts by the Postal Service to communicate with employees and unions about this incident generally followed this guidance, a lack of explicit instructions in the guidance on providing information to employees and unions may have contributed to some communications issues that arose.

USPS Had a Number of Guidelines for Identifying and Responding to Suspect Mail but They Were not Consistent or Clear

The Postal Service's suspicious mail guidelines in October 2003 had been developed or updated following the fall 2001 anthrax incidents to ensure that postal personnel took appropriate precautions upon discovering a suspicious package or envelope. However, these guidelines contained instructions that were not entirely consistent. Also, the types of scenarios they applied to may not have been entirely clear to employees and some appeared to apply only to incidents involving suspicious powders. Furthermore, some related procedures for identifying and segregating mail containing or that could contain hazardous materials did not clearly specify what employees should do if a mail piece identified as possibly containing a hazardous material also had characteristics of suspicious mail. Finally, USPS had general guidelines regarding communicating with employees and unions, but these guidelines did not clearly specify who should provide and

receive information on suspicious mail incidents or when information should be provided. According to GAO's internal control standards, appropriate policies and procedures should exist with respect to each agency activity.

Guidelines for Identifying and Initially Responding to Suspicious Mail

At the time of the incident in Greenville, key Postal Service guidance on suspicious mail included two documents—"decision trees" and a poster—as well as a training exercise. (See table 2.) The decision trees guideline and the training exercise were mainly aimed at managers and supervisors, while the poster was aimed at all postal employees as well as the public. Both the facility manager and shift supervisor had undergone the training exercise, which focused on handling incidents involving a questionable substance leaking from a mail piece.

Table 2: Key USPS Guidance in Place on October 15, 2003 on Identifying and Initially Responding to Suspicious Mail

Type of guidance	Intended audience	Date issued or updated	Description
Guidance documents			
Decision trees	Managers and supervisors	October 2001 Updated in March 2003	Presented separate sets of actions to take, in a flowchart format, in incidents involving a suspicious unopened/sealed mail piece and in incidents involving an open mail piece leaking a suspicious powder. ^a Also, included different actions for small and large facilities to take during either type of incident. Developed based on CDC advisories.
Suspicious mail poster	All employees and the public	October 2001 Updated in March 2003	Portrayed, in a one-page poster with a photo, how to identify a suspicious mail piece and key actions to take upon discovery. Also, presented additional separate guidance for situations involving a suspected bomb, radiological threat, or biological or chemical threat.
Training			
Suspicious powder tabletop exercise	Managers, supervisors, and support staff	April 2003	Presented actions to take in incidents involving a suspicious powder leaking from a mail piece. Consisted of a series of scenarios portraying phases of a hypothetical incident and active exercises in responding to these scenarios. Included the decision trees.

Source: GAO analysis of USPS suspicious mail guidance.

Note: In addition, in November 2001, USPS issued interim guidelines for responding to an anthrax release that covered a range of response activities—including sampling, analysis, and decontamination—and also included guidance on the initial response to a suspected incident.

^aAccording to USPS officials, its Mail Security Task Force, which includes representatives of employee unions and management associations, reviewed these guidelines during their development.

The guidance documents and training exercise described characteristics for employees to look for to detect "suspicious" packages and envelopes

that could potentially pose a threat, such as a bomb or a biological threat. These characteristics included the following:

- Lopsided or uneven.
- Powdery substance on the outside.
- Odors, discoloration, or oily stains.
- Excessive postage or tape.
- No return address.
- Handwritten or poorly typed address.
- Marked with restrictions, such as “Personal,” “Confidential,” or “Do Not X-Ray.”
- Threatening message.

However, the suspicious mail characteristics in these guidelines were not consistent and none of the guidelines had a complete list of suspicious mail characteristics. (See fig. 4.) Some characteristics were cited in only one or two of these guidelines. For example, only the decision trees cited “threatening message” as a characteristic of suspicious mail and only the poster cited excessive tape. Also, the poster and training exercise cited restrictive markings as a characteristic of suspicious mail while the decision tree did not.

The guidance documents and training exercise also provided instructions on initial steps to take upon discovering a suspicious mail piece. (See fig. 4.) In general, they advised isolating the mail piece and notifying others with expertise in assessing threats associated with mail pieces, such as postal inspectors and local law enforcement. Recommended initial steps were not consistent, however. The decision trees, intended for use by USPS managers and supervisors, advised not handling the mail piece and notifying the supervisor and Inspection Service before contacting the local police and hazardous materials unit. The poster, intended for use by the public as well as postal employees, recommended handling a suspicious package or letter with care and calling local law enforcement. The poster also advised more precautions if a biological or chemical threat was suspected, including *not* handling the mail piece and calling police, postal

inspectors, and the local hazardous materials unit. The training exercise, intended for USPS managers and supervisors, focused on suspicious powder incidents and recommended response steps similar to those in the decision trees.

Figure 4: Comparison of Instructions in Suspicious Mail Guidance

	Decision tree for a suspicious unopened/sealed envelope or parcel	Suspicious mail poster		Suspicious powder tabletop exercise training ^a
		General suspicious mail	Mail with a suspected biological or chemical threat	
Number of suspicious mail characteristics	9	12	Same	13
Characteristics that appear only in identified guidance	<ul style="list-style-type: none"> • Loose sifting material • Threatening message 	<ul style="list-style-type: none"> • Rigid or bulky • Excessive tape • Sealed with tape 	Same	Postmark does not match sender's address
Initial response actions	Do not handle further	Handle with care Do not shake or bump		Do not disturb powder in any way
	Do not shake or empty contents	Do not open, smell, touch, or taste		
	Isolate the package without further contact	Isolate it immediately	Isolate Don't handle	
	Leave area and prevent others from entering		Evacuate immediate area	Prevent others from entering
	Wash hands with soap and water		Wash hands with soap and warm water	Wash hands with soap and water
	Treat it as suspect			
Notification of others	Contact supervisor if available ^b			Contact supervisor as soon as possible
	Supervisor or employee contacts in order: <ul style="list-style-type: none"> • Inspection Service • Local police and hazardous material contacts • Postmaster^c (who contacts district manager) • Safety office^d 	Call local law enforcement authorities	<ul style="list-style-type: none"> • Call police • Contact postal inspectors • Call local fire department hazardous materials unit 	Supervisor contacts in order: <ul style="list-style-type: none"> • Inspection Service • Local police and hazardous material contacts • Postmaster (who contacts district manager) • Safety office
Other response actions	Building occupants should remain in a place of refuge away from the mail piece and await emergency responders. In large facilities, the spill and leak team examines the scene, attempts to determine if an emergency exists and takes defensive actions (tape off area, shutdown ventilation, etc.).			If facility manager has called the local responders, then maintain isolation around the spill site and place all building occupants in a place of refuge away from the spill.

Source: GAO analysis of USPS suspicious mail guidance.

Note: Shaded boxes indicate that similar information was not found in identified guidance.

^aThese are steps for small offices. USPS has separate training for large offices. Also, these represent key steps presented in the training that are similar to those in the other guidelines. The training also provided more detailed guidance on actions to take in response to a suspicious powder incident.

^bThe subsequent steps are for small facilities, unless otherwise noted. The decision tree for large facilities included additional response actions for the supervisor.

^cAccording to a USPS official, the basic intent of the instruction to contact the postmaster is to contact the next level of management, which for the Greenville airmail facility would be the senior plant manager.

^dThe safety office supports management by monitoring and assessing safety hazards and potentially unsafe conditions and providing support to spill and leak teams, among other things.

The types of scenarios these guidelines applied to may not have been entirely clear to employees. While the decision trees provided the most complete guidance on responding to suspicious mail incidents involving nonleaking as well as leaking mail, at the time of the incident the circumstances under which they were intended to be used may have been unclear. The manager of the Greenville airmail facility told us that, at the time of the incident, he thought the decision trees were for anthrax-related emergencies only. When the Postal Service first issued this guideline in October 2001, it noted that it applied to scenarios involving the potential release of anthrax spores as well as "similar bioterrorist incidents." However, the March 2003 version of this guideline was titled "*Updated Decision Trees for Suspicious Mail Pieces and a Powder Release from a Mail Piece*" and Postal Service management indicated that it could be used in various situations involving a suspicious mail piece.¹³ Furthermore, while the poster recommended more precautionary steps in instances in which a biological or chemical threat was suspected, postal officials have acknowledged that it could be difficult for employees to determine if a mail piece potentially posed such a threat if it was not leaking a substance. Finally, the training focused on scenarios involving the discovery of a suspicious powder and therefore its applicability to other types of scenarios may not have been clear.

Procedures for Identifying, Handling, and Responding to Hazardous Materials in the Mail

In addition to the guidelines described above, which were aimed at taking precautions against possible threats in the mail, USPS had "hazardous material handling" procedures that instructed employees to identify routine mail containing hazardous material that is properly packaged and labeled, as well as mail that may contain hazardous material and that is not properly packaged and labeled, and separate such mail from other mail by moving it to another area.¹⁴ Among the characteristics that employees are trained to look for, to detect mail containing or that may contain hazardous material, are warning labels and stains, leakage, or an unusual odor. These characteristics are similar to ones employees are told to look for in

¹³The version in the April 2003 training exercise was titled "*Decision Trees for Anthrax-related Emergencies*."

¹⁴A hazardous material is any article or substance designated by the U.S. Department of Transportation as being capable of posing a risk to health, safety, and property during transportation. Most hazardous materials are nonmailable. However, USPS does accept for mailing some specified hazardous materials, if properly packaged and labeled according to Postal Service requirements and in quantities not large enough to present a serious hazard to safety or human health. Examples of such materials are medical samples, pesticides and herbicides, propane, and paint.

detecting suspicious mail. However, these hazardous material handling procedures do not instruct employees on what to do if an envelope or package has characteristics of both suspicious mail and mail containing or that may contain hazardous material.

USPS also had procedures and related guidelines, generally issued prior to the anthrax incidents, on responding to the release of hazardous materials, including releases of powders or other substances from mail pieces. These documents described the role of spill and leak teams, generally located in large postal facilities, which are trained to respond to releases and to determine whether an emergency exists. The decision trees also indicated that, in large facilities, these teams could respond to suspicious mail incidents without spills or leaks. The Greenville airmail facility is considered to be a small facility, with about 35 employees, but did use the spill and leak team from a nearby large plant in this incident.

In emergency situations, USPS facilities were expected to follow their “emergency action plans,” which outline actions to take, such as evacuating employees and calling local first responders, in a variety of emergency situations. The Greenville emergency action plan included initial actions to take in response to a hazardous material release and a suspected anthrax release, but not for other types of suspicious mail situations. In a bulletin to Postal Service management following the incident, USPS stated that these plans must include instructions for responding to suspicious mail pieces, including guidance on initial action, isolation, evacuation, and notifications.

Guidance on Communicating with Employees and Unions

At the time of the incident, the Postal Service’s suspicious mail guidance contained some recommendations regarding communications with employees and unions. In an e-mail message accompanying the March 2003 decision trees, USPS headquarters stated that communications are a vital part of the process for responding to suspicious mail and that “employees and their representatives must be kept informed at all stages, including the final results and resolution of the incident.” Also, the suspicious powder training exercise recommended that, in suspicious powder incidents in which emergency responders have become involved, management should provide unions and employees with current information on the situation on

a regular frequency.¹⁵ However, this guidance did not specify who is authorized to provide information, when information should be provided and to whom, and what types of information should be shared.

In addition, since the late 1990s, postal managers in USPS's Eastern area, which includes South Carolina, have been encouraged to hold brief discussions with employees at the beginning of each workday regarding workplace performance and business updates. The purpose of this practice is to increase communication with employees and, according to postal officials, such discussions could include providing information on suspicious mail incidents.

Suspicious Mail Guidance Was Not Always Followed

During the incident, personnel at the Greenville airmail facility followed some, but not all, of the steps in the suspicious mail guidance. In particular, the envelope was moved several times, employees returned to the work area where the envelope had been, and notifications of the Inspection Service and emergency responders were not made in the order recommended and were delayed. Because the envelope had some characteristics of mail containing hazardous material and the personnel did not know what ricin was, they also followed hazardous material handling procedures. (See table 3.) Greenville postal management explained that, since the envelope also had some characteristics of suspicious mail, they were uncertain how to respond and were trying to determine the best course of action to take. Lack of clarity and consistency in the suspicious mail guidance as well as a lack of guidance on what to do if a mail piece has characteristics of both suspicious mail and mail containing hazardous materials may have contributed to this uncertainty and to the fact that some of the steps in the suspicious mail guidance were not followed. Since the suspicious mail guidelines take a precautionary approach to protect employees from possible threats, including biological and chemical agents,

¹⁵In addition, according to postal officials, general provisions in the Postal Service's collective bargaining agreements with employee unions required it to provide unions with information on workplace conditions, including information on suspicious mail incidents. These agreements require USPS to make available to the unions all relevant information necessary for collective bargaining or the enforcement, administration, or interpretation of the agreements, including information necessary to determine whether to file or continue the processing of a grievance under the agreement. Under the agreements, employees may file a grievance if they believe they are being required to work under unsafe conditions, among other reasons.

if a mail piece contained such an agent, not following these guidelines could result in employees being exposed to the agent.

Characteristics of the envelope that were consistent with indicators in the suspicious mail guidelines were no return address and a message that could be considered threatening or restrictive: “Caution: RICIN POISON. Enclosed in sealed container. Do not open without proper protection.” In addition, the facility manager told us that the lack of an addressee and postage raised concerns.¹⁶ Furthermore, it was likely that the envelope was lopsided, since it contained only the threat letter and a vial the size of a “C” battery. However, the message on the envelope, particularly the words *caution* and *poison*, could also be interpreted as characteristics of mail containing hazardous material since this type of mail typically has warning labels and *poison* is a type of hazardous material.

Table 3: Extent to Which Initial Response Actions Were in Accordance with Suspicious Mail Guidance and Procedures for Handling Mail Containing Hazardous Materials

Time period	Actions taken	Were actions in accordance with suspicious mail guidelines?	Were actions in accordance with hazardous material handling procedures?
12:15 a.m. to 1:00 a.m.	Employee separated envelope from other mail and brought it to her supervisor.	Yes – poster ^a No – decision tree ^b	Yes
	Supervisor isolated envelope, cordoned off the area, and evacuated employees.	Yes ^c	N/A
	Employee instructed to wash hands. ^d	Yes	N/A
	Based on instructions from the facility manager, supervisor moved envelope to a conference room.	No	Yes
	Based on instructions from the facility manager, supervisor allowed employees to return to work room.	No	Yes

¹⁶The Postal Service defines a piece of mail as a single addressed article of mail. However, Postal Service officials told us that envelopes or packages without an address that appear suspicious should be handled according to suspicious mail guidance.

(Continued From Previous Page)

Time period	Actions taken	Were actions in accordance with suspicious mail guidelines?	Were actions in accordance with hazardous material handling procedures?
8:00 a.m. to 12:00 p.m.	Facility manager contacted: <ul style="list-style-type: none">• Safety officer at 8:10 a.m.• Inspection Service at 9:00 a.m., 11:00 a.m. and 12:00 p.m. (left two non-urgent messages but did not speak with inspector until noon)• Postmaster^e at 11:00 a.m.• Local police at 12:00 p.m. (contacted after speaking with inspector)	No (did not call in order recommended and calls delayed)	N/A
	Spill and leak team examined scene at 9:00 a.m., double-bagged the envelope, put it in a separate room, and put "Do Not Enter" signs on the doors.	Yes ^f	N/A

Source: GAO analysis of actions taken during the response as well as USPS suspicious mail guidance and hazardous material handling procedures.

Note: N/A means that the action was not applicable to this type of guidance.

^aThe poster indicates that suspicious mail should be handled with care, but that if a biological or chemical threat is suspected for the mail piece not to be handled.

^bThe decision tree calls for not handling suspicious mail further. Training is not applicable for this action because the training calls for not disturbing a suspicious powder and this incident did not have a powder.

^c The suspicious mail guidelines recommend moving employees to a place of refuge, but do not call for evacuating the facility. Supervisor took this action as an extra precaution.

^d According to the facility manager, the supervisor told the employee to wash her hands.

^eThe facility manager contacted the senior plant manager at 11:00 a.m. Although suspicious mail guidelines indicate that the postmaster should be contacted, postal officials have told us that the basic intent of this instruction is to contact the next level of management, which, for the Greenville airmail facility, would be the senior plant manager.

^fHowever, spill and leak team members have stated that they were told to respond in spite of concerns. Also, moving the envelope was not in accordance with suspicious mail guidelines.

According to the facility manager, the employee who discovered the envelope perceived it to be mail containing hazardous material, based on the words "caution" and "poison" on the envelope. She then took steps that followed USPS procedures for handling this type of mail. She prevented the envelope from entering the mail stream by removing it from the machine she was working on and notified her supervisor of her discovery. The employee also segregated the envelope from other mail when she brought it to her supervisor, who was located 30 to 40 feet away. Notifying the supervisor was in accordance with guidance on responding to suspicious mail, but handling and moving the envelope was not in accordance with some of this guidance. (Although the decision tree advised not handling a suspicious mail piece, the poster stated that suspicious mail should be handled with care.) In addition, according to the facility manager, the

employee washed her hands on the advice of the supervisor. This was in accordance with suspicious mail guidelines.

The supervisor took actions that were in accordance with suspicious mail guidelines. Specifically, the supervisor isolated the envelope and prevented other employees from entering the area. He also evacuated the facility as an additional precaution. According to the USPS after action report for this incident, the supervisor was using knowledge learned during the suspicious powder training exercise. According to Greenville postal officials, the facility's emergency action plan, which outlines evacuation procedures, was activated at this point.

The facility manager took some actions that were in accordance with the hazardous material handling procedures as well as the suspicious mail guidance, but did not fully follow the steps in the suspicious mail guidance. While on the phone with the supervisor, the facility manager decided that since the envelope was not leaking, employees could be allowed back into the building. He explained that, at that point, he did not know what ricin was and thought that the envelope could contain hazardous material but was not properly labeled, so he had the envelope segregated from other mail. Also, because the envelope indicated that a poison was inside, he instructed that the envelope be moved to another room, rather than placed in the designated area for such mail, as an extra precaution. Once the envelope was moved to another room, the employees were allowed to return to the facility. These actions were in accordance with the hazardous material handling procedures, which included instructions for segregating hazardous material mail in an area away from work areas and traffic flows. However, suspicious mail guidelines indicated that if something is suspicious, employees should be kept in a place of refuge away from the mail piece until local emergency responders arrive. Also, moving the mail piece was not in accordance with suspicious mail guidelines. The suspicious mail procedures take a precautionary approach in order to protect employees from unknown threats, therefore, following hazardous material handling procedures could unintentionally expose employees to a harmful substance if a mail piece actually contained a threat and not routine hazardous material.

When the facility manager observed the envelope after he reported to work at about 7:30 a.m., he took an action that is not outlined in USPS guidance. Because he still did not know what ricin was he consulted a dictionary, which provided a brief description (a poisonous protein from the castor bean), and then he contacted the local safety officer for further

assistance.¹⁷ By doing so, the facility manager did not follow the order of notification outlined in the suspicious mail guidance. The guidance specifies that the Inspection Service should be notified first and then emergency responders. According to the facility manager, he did not want to call the Inspection Service or local emergency responders if the situation was something that could be handled by facility personnel. The procedures for handling mail containing hazardous materials state that the Inspection Service should be contacted only when considered necessary and do not mention contacting the safety officer.

The safety officer contacted the spill and leak team to respond to the situation, which was in accordance with suspicious mail guidelines. The spill and leak teams are USPS-facility based teams trained to respond to routine spills and leaks in the postal system. Although there was no spill or leak associated with this envelope, Greenville postal officials told us that they called the spill and leak team to respond as an extra precaution. According to Postal Service procedures for these teams, they must initiate the facility's emergency action plan, which includes evacuation and calling emergency responders, if they encounter a material that is outwardly hazardous.¹⁸ One of the team members, who may have had some knowledge of ricin based on military training, voiced concerns to his supervisor about the appropriateness of the spill and leak team responding to the incident.¹⁹ The supervisor, acting on the team member's concerns, contacted the safety officer to discuss the situation. According to the safety officer, she offered to respond instead, since she had the required training, but the supervisor of the team called back afterward indicating that he and

¹⁷USPS has links on its internal Web site to Web pages maintained by CDC and the Occupational Safety and Health Administration that provide information on various bioterrorism and chemical agents, including ricin, and, according to postal headquarters officials, these links were available to postal employees at the time of the incident.

¹⁸According to these procedures an outwardly hazardous material or situation exists if a mail piece is smoking, irritating, odorous, labeled or marked as hazardous, if the material is in a gaseous or solid powder form and is migrating away from its container, if defensive measures have not worked, or if the situation appears to be getting worse. In a USPS-issued bulletin issued shortly after the incident, on October 30, 2003, spill and leak teams are instructed to retreat and call for outside expert assistance if they suspect or confirm an emergency.

¹⁹In addition, at the time of the incident, one of the three people responding as the spill and leak team did not have the required training to be part of this team. The supervisor explained that, at the time, he thought that the employee had received the required training.

the team would respond. According to the team members, they were told to respond in spite of their concerns.

When the spill and leak team arrived at the facility, it double-bagged the envelope and moved it to a separate room, where they isolated it by closing the room and putting “Do Not Enter” signs on the doors. They did not initiate the facility’s emergency action plan. Some of these actions are in accordance with the suspicious mail guidelines, which call for the team to take defensive actions. However, moving the envelope was not in accordance with these guidelines and the information the one team member had about ricin should have been considered in determining whether an emergency existed.

The facility manager did not attempt to contact the Inspection Service until approximately nine hours after initial discovery, after speaking with the safety officer, and made an additional attempt before actually speaking with an inspector about 12 hours after the discovery. He did not call the Inspection Service first, as recommended in the suspicious mail guidelines. Hazardous material handling procedures stated that the supervisor should call the Inspection Service “if necessary,” concerning a mail piece that may contain hazardous material but that is not properly labeled. Although the suspicious mail guidelines had no references to how quickly contact with the Inspection Service should occur after suspicious mail is discovered, a message to managers in 2002 on the identification and handling of suspicious mail included instructions that the Inspection Service should be called immediately after the identification of a suspicious mail piece. Upon receiving calls regarding suspicious mail, postal inspectors conduct an initial threat assessment and provide advice to facility managers regarding immediate actions to be taken, such as whether to call emergency responders.

USPS officials, at both the local and headquarters levels, acknowledge that not contacting the Inspection Service immediately was not an optimal way to handle the situation. Inspection Service officials told us that they would rather be called during an incident and have it turn out to be nothing than to not be called when they should have been.

The facility manager notified the senior plant manager about the situation about 11 hours after the discovery of the envelope. Suspicious mail guidelines indicate that the postmaster should be contacted after contacting the Inspection Service and emergency responders. According to a USPS official, the basic intent of this instruction is to contact the next

level of management, which for the Greenville airmail facility would be the senior plant manager.

The facility manager did not call local emergency responders until more than 12 hours after discovery. According to suspicious mail guidelines, such contact is to be made after contacting the Inspection Service. The facility manager did contact the local emergency responders after speaking with the Inspection Service, based on the advice of the inspector he spoke with. According to the facility manager, he did not call emergency responders earlier because he determined that the envelope was not an immediate threat to employees, since it was not leaking, and he was waiting to speak to the Inspection Service.

Communications with Employees and Unions Were Generally in Accordance with Existing Guidance

Actions by Greenville postal management and USPS headquarters to communicate with employees and unions regarding the incident were generally in accordance with guidance in place at the time. The facility manager told us that, after the envelope was removed from the facility on October 15, he and the supervisor informed employees of the situation as they reported to work. He explained that the information they provided included what was written on the suspicious envelope and that the envelope had been taken to the state health department to be tested. According to the manager, he gave employees, including union representatives working at the facility, all the information that was available for him to provide.²⁰ Also, USPS provided talks and news releases to employees and notified local unions on October 22, after the results of CDC's testing were available and after coordinating with CDC and the other involved federal and state agencies. These communication efforts were generally in accordance with recommendations in the suspicious mail guidance to keep employees and their representatives informed.

However, according to officials from one union representing employees at the facility, the Postal Service did not provide any formal communication to local postal unions in the Greenville area about the incident until October 22, 7 days after the discovery of the envelope.²¹ Union officials told us that,

²⁰He noted that he could not provide some details because he had been instructed not to do so due to the investigation of the incident.

²¹According to these union officials, USPS informed its national office about the incident by phone the day after it occurred, on October 16.

prior to the testing results being presented by the Postal Service, rumors were circulating among employees about the incident. Some Greenville employees first learned about the test results from the media rather than USPS and, according to the facility manager, some of the information in these media reports was not accurate. The manager explained that he was told not to release any information on the situation until it had been approved by headquarters. He also explained that he could have kept employees better informed and prevented concerns if he had received information on the testing of the substance earlier.

In addition, according to the manager, sometime between October 15 and 21, he found information about ricin on CDC's website, printed copies of this information, and made them available to employees and union representatives. He also told us that he shared this information verbally with employees. However, headquarters officials told us that they do not want facility managers to provide health-related information to employees and that such information should be provided by a health professional. CDC officials have told us that, considering the volume of incidents nationwide that lead to testing of suspicious mail pieces, particularly those involving unknown powders, they believe it is best to wait until the presence of a biological or chemical agent is confirmed to provide information to employees on symptoms of exposure.

USPS Has Made a Number of Improvements in its Suspicious Mail Guidance, but Some Key Elements Are Lacking

Since the ricin incident in Greenville in October 2003, USPS has made a number of changes in its guidance on identifying and initially responding to suspicious mail that have improved its clarity and consistency, therefore addressing some issues raised by the incident. These improvements will enhance its ability to manage risks posed by potential biological and chemical threats in the mail. However, some key elements are lacking. Without these elements in its guidance, some issues that impaired the response to the Greenville incident could impair responses to future incidents. In particular, the Postal Service has not provided guidance for employees on actions to take if a mail piece has characteristics of both suspicious mail and mail containing hazardous material, or training for managers and supervisors on suspicious mail that presents all the guidance they may need to make appropriate decisions. The lack of these types of guidance could limit the ability of postal personnel to decide whether a mail piece is suspicious and whether initial response actions, such as shutting down equipment and calling postal inspectors, are warranted. In addition, the Postal Service has not provided explicit guidance on communicating with employees and unions regarding suspicious mail

incidents. Without this type of guidance in place, employees and unions may not receive timely information regarding mail suspected of containing a biological or chemical agent that is sent for testing.

USPS Has Made Improvements in its Guidance on Identifying and Responding to Suspicious Mail

According to headquarters postal officials, the ricin incident illustrated the need to ensure that all postal employees have the same understanding of steps to follow for identifying and responding to suspicious mail. Officials have emphasized that their suspicious mail guidance has evolved since 2001 and acknowledged that different types and versions of guidance issued over time contained inconsistencies that could be confusing. Following the incident, USPS officials have sought to clarify the process for identifying and responding to suspicious mail and raise employee awareness of this process by developing and issuing new simpler and standardized guidance. (See table 4.) Main goals of these efforts include avoiding or minimizing employee exposure and rapidly assessing risk.

In November 2003, USPS issued new guidelines for postal employees on characteristics to look for in identifying suspicious mail, using an easy to remember acronym—SLAP. This guidance categorizes indicators into the following four categories:

- unusual Shape, such as an uneven or lopsided package,
- unusual Look and odor or sound, such as powder on the package or a ticking sound,
- unusual Address features, such as no return address or suspicious or threatening language on the outside of the mail piece, and
- unusual Packaging, such as excessive tape or string.

Table 4: Key USPS Guidance on Identifying and Responding to Suspicious Mail Developed or Issued After October 2003 Incident

Type of guidance	Intended audience	Date issued	Description
Guidance documents^a			
Postal bulletin on handling suspicious mail pieces	Managers and supervisors	October 2003	Cites the ricin incident and emphasizes key steps for responding to a suspicious mail piece. States that the suspicious powder exercise can be applied to many suspicious mail incidents.
“SLAP” guidance on identifying suspicious mail	Managers and supervisors	November 2003	Presents characteristics of suspicious mail in four “easy to remember” categories, based on the acronym SLAP: unusual Shape, Look, Address features, or Packaging.
“Three Ps” guidance on responding to suspicious mail	Managers and supervisors	October 2003	Presents “three simple steps” for responding to a suspicious package: <ul style="list-style-type: none"> • Package – don’t handle it. Isolate the area. • People – evacuate the area around the package and notify your supervisor. • Plan – contact the Inspection Service, police and community first responders.
Suspicious mail poster	All employees	February 2004	Presents the October 2003 Three Ps guidance in a poster for USPS employees.
Response checklist	Managers and supervisors	USPS plans to issue in late July 2005	Presents a checklist of actions to take in response to suspicious mail and unknown powders or substances. ^b
Poster on immediate response actions	All employees	USPS plans to issue in early August 2005	Presents the Three Ps guidance as well as more detailed instructions for employees, supervisors, and managers on initial actions to take in response to suspicious mail and unknown powders or substances. ^b
Training			
Suspicious powder tabletop exercise	Managers, supervisors, and support staff	September 2004	Updated version of 2003 training. Discusses actions to take in incidents involving a suspicious powder leaking from a mail piece. Consists of a series of scenarios portraying phases of a hypothetical incident and active exercises in responding to these scenarios.
Mandatory talks on handling suspicious mail	All employees	November 2003	Monthly mandatory talks delivered by managers and supervisors to postal employees nationally. Focuses on the use of SLAP and the Three Ps, respectively, for identifying and responding to suspicious mail.

Source: GAO analysis of USPS suspicious mail guidance.

^aIn addition, in December 2003 and December 2004, USPS issued updated versions of its guidelines for responding to an anthrax release that it originally issued in November 2001. These guidelines cover a range of response activities—including sampling, analysis, and decontamination—and also include guidance on the initial response to a suspected incident.

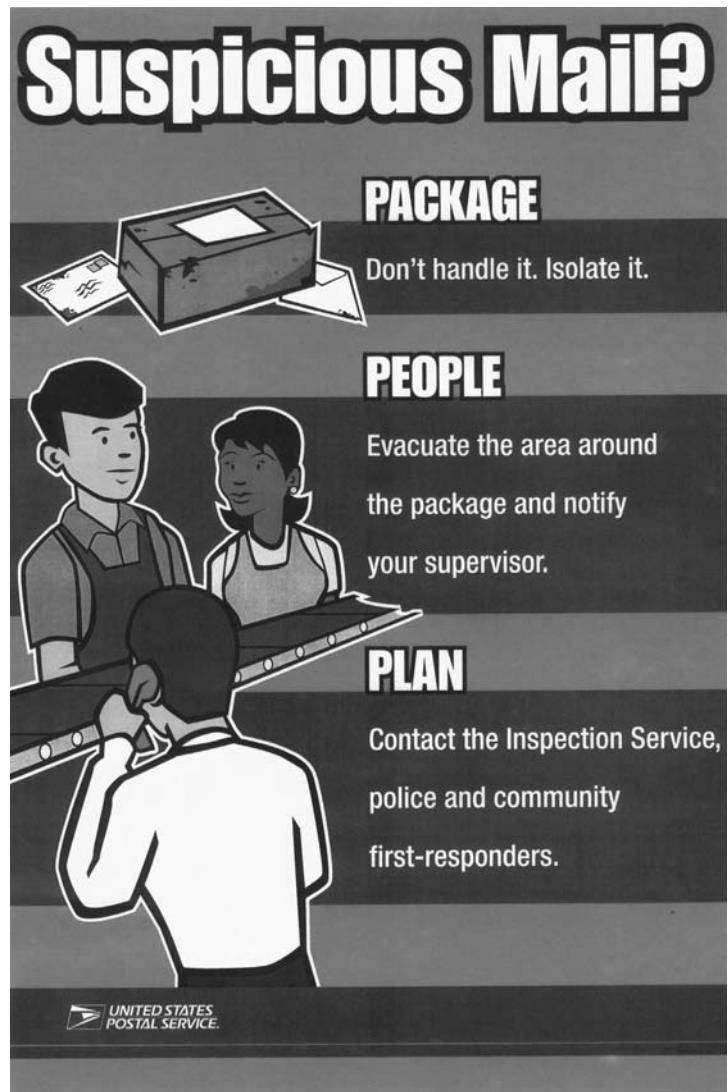
^bAccording to USPS officials, its Mail Security Task Force, which includes representatives of employee unions and management associations, reviewed these procedures during their development.

These new categories provide greater clarity about how to identify a suspicious mail piece, in a uniform, easy to remember format. Also, unlike some previously issued guidance, they do not involve any determinations

of the type of threat, such as a biological or chemical threat, that a mail piece may pose. In addition, USPS added several new characteristics for employees to look for. One such characteristic—suspicious or threatening language on the outside of the mail piece—may have helped the Greenville airmail facility personnel to identify the envelope in the ricin incident as suspicious mail. (Previously, threatening language had only been cited in the decision tree guidelines, which were aimed at managers and supervisors.) USPS headquarters officials have emphasized that they want to make the initial decision about whether a mail piece is suspicious as simple as possible and that postal employees and managers generally have much experience to draw on, in addition to the SLAP indicators, in making these determinations.

USPS has also produced new simplified guidance on responding once a mail piece has been identified as suspicious. In October 2003, USPS issued guidance on “three simple steps” to follow with easy to remember labels—*Package, People, and Plan*—referred to as the “three Ps.” (See fig. 5.) It followed up with a new poster for employees on these steps in February 2004. This new guidance places additional emphasis, in an easy to understand format aimed at all employees, on isolating and not handling suspicious mail pieces, keeping employees away, and notifying postal inspectors and emergency responders. It could help to prevent uncertainty about appropriate initial response actions to an envelope or package with characteristics of suspicious mail, as occurred in the Greenville incident.

Figure 5: USPS Three Ps Poster



Source: USPS.

Since 2003, in addition to producing new guidance for identifying and responding to suspicious mail, USPS has made efforts to make employees more aware of this guidance. In particular, since November 2003, it has delivered monthly talks to employees that reiterate the "SLAP" characteristics of suspicious mail pieces and the "Package, People, and Plan" steps for responding. USPS has also communicated its guidelines to

employees through other means, including its internal Web site and news publications. Finally, it has updated its suspicious powder tabletop exercise to include new instructions to consult with postal inspectors prior to evacuating the facility or contacting emergency responders, unless an emergency exists. According to postal officials, these efforts have been successful in making employees aware of the appropriate actions to take in response to suspicious mail. They cited as evidence the results of a recent survey regarding suspicious powder incidents that the Postal Service sent to a random sample of employees. Ninety one percent of employees who responded reported that they know the proper steps to take when discovering a suspicious powder.²² In a recent review of responses to suspicious mail incidents at selected postal facilities, the USPS Office of Inspector General found that postal personnel were generally aware of policies for handling suspicious mail. However, they also found that supervisors at some facilities did not follow established guidance when managing suspicious mail incidents.²³

To provide further clarification for employees on how to respond to suspicious mail, USPS convened a working group in late 2004 to review existing guidelines and come up with consistent, easy to understand procedures for employees to follow. This working group developed new procedures for response actions to take after identifying a suspicious mail piece or an unknown powder or substance. These new procedures include a checklist of response steps for managers and supervisors as well as a poster for all employees. USPS plans to distribute the checklist to managers and supervisory employees in late July 2005. It also plans to distribute the poster to all facilities and the poster in brochure form to all employees in early August 2005.

According to postal officials, these new procedures are based on CDC guidance on handling suspicious mail as well as other emergency

²²According to postal management, these results are based on responses to a questionnaire that was sent to the homes of a random sampling of employees. Ten thousand employees received the questionnaire and 2,921 responded.

²³See USPS, Office of Inspector General, *Management Advisory – Response to Incidents Involving Suspicious Mail and Unknown Powders and Substances*, DA-MA-05-001 (Washington, D.C.: May 27, 2005). In another recent review of a suspicious mail incident that occurred in Washington, D.C., in August 2004, the Inspector General found that Postal Service and Inspection Service personnel did not effectively respond. See USPS, Office of Inspector General, *Postal Service Practices with Regard to Handling Suspicious Mail*, SA-OT-05-002 (Washington, D.C.: May 20, 2005).

management guidance. Officials have emphasized that the approach they have developed for responding to suspicious mail is conservative because it calls for taking immediate actions to protect employees when there is a suspicion that a mail piece could be harmful, but before this is confirmed.

These new procedures clarify initial steps that should be taken upon the discovery of a suspicious mail piece. In particular:

- They are clearly applicable to all types of suspicious mail incidents. Some previously issued guidance appeared to apply only to incidents involving suspicious powders or suspected anthrax releases.
- They highlight circumstances when emergency responders should be called immediately.
- They reflect the expanded role of postal inspectors. If no clear emergency exists but a mail piece is suspicious, inspectors should be called and will help determine subsequent actions.
- They provide some additional guidance on initial communications with employees and unions regarding suspicious mail incidents.
- They clearly specify other initial actions to take to protect employees.

Unlike some earlier guidance, postal officials are considering the new checklist and poster to be procedures representing required immediate steps to take in response to suspicious mail and not guidelines representing recommended steps. Also, USPS has announced that the new procedures supercede some previous guidance, including the decision trees.²⁴

Since early 2003, the Inspection Service has worked closely with USPS to define an expanded role for postal inspectors in responding to suspicious mail incidents, including incidents involving mail leaking an unknown

²⁴In its recent report on the Postal Service's responses to suspicious mail incidents, the Office of Inspector General recommended that the Postal Service remove all outdated references on its internal suspicious mail Web site. The Postal Service responded that it would place the new procedures on its Web site and that it is currently removing from the site all information and documents containing conflicting procedures to ensure consistency of policy. See USPS, Office of Inspector General, *Management Advisory – Response to Incidents Involving Suspicious Mail and Unknown Powders and Substances, DA-MA-05-001*.

powder as well as non-leaking suspicious mail.²⁵ USPS procedures regarding the release of hazardous materials state that spill and leak teams are to be called in when there are leaks from mail pieces, and that, when they encounter an unknown substance, they should initiate emergency procedures. These procedures call for evacuating the facility and calling local emergency responders. However, after the anthrax incidents in fall 2001, a large number of incidents involving unknown powders leaking from mail pieces occurred in the postal system, disrupting operations and placing a heavy burden on local emergency responders. To address this problem, inspectors now are expected to respond to incidents involving mail leaking unknown powder as well as other types of suspicious mail incidents.

Once a suspicious mail incident is determined to be an emergency, such as when there are fumes or employees exhibit medical symptoms, USPS emergency procedures need to be followed. In January 2004, USPS established the Integrated Emergency Management Plan (IEMP) as the Postal Service's "all-hazard" comprehensive plan for responding to all types of emergencies, including natural disasters and man-made hazards. A major goal of the IEMP is to establish a standardized emergency management process throughout the postal system. The IEMP provides instruction for individual facilities to follow in response to emergencies affecting their facility and is tailored to the risks at each facility. It is currently being implemented at facilities with biohazard detection systems and, for those facilities, includes response plans for system alerts.²⁶ USPS is currently revising the IEMP to align it with guidance in DHS's National Response Plan, including guidance on responding to biological threats.²⁷ According to postal officials, the Postal Service plans to incorporate its new suspicious mail procedures into the IEMP and implement the plan at all USPS facilities by the end of fiscal year 2005.

²⁵To prepare for this new role, the Inspection Service has provided over 200 of its 1,877 inspectors with training in responding to dangerous mail, including hazardous material releases from mail. It plans to have these inspectors become part of dangerous mail response teams located throughout the United States. The Inspection Service has also established a system for reporting on suspicious mail incidents and plans to provide inspectors with equipment that will assist in the assessment of suspicious substances.

²⁶A system alert is a signal from a biohazard detection system when its internal test indicates the presence in the mail stream of the bacterium that causes the disease anthrax.

²⁷DHS issued the National Response Plan, a comprehensive plan for addressing all hazards, in January 2005.

The IEMP includes procedures for notifying USPS managers, postal inspectors, and other internal and external stakeholders, including unions and employees, when various types of emergencies occur. For facilities with biohazard detection systems, it establishes responsibilities of managers and safety officers at the local level for providing initial talks to employees and for notifying local union representatives of system alerts and subsequent positive or negative testing results. It also establishes responsibilities of headquarters officials for informing national union representatives of such alerts and testing results. Also, in other cases of a suspected anthrax release, USPS's current anthrax guidelines establish responsibilities of facility managers for notifying employees and union representatives of testing results and of headquarters officials for notifying national unions of such results.

We have advocated a risk management approach as a framework to guide decision making in federal agencies.²⁸ A risk management approach entails a continuous process of managing, through a series of mitigating actions, the likelihood of an adverse event happening with a negative impact. While risk management cannot eliminate risk, it can help reduce risk by enhancing protection from known or potential threats with a goal of providing reasonable assurance that an organization's objectives will be achieved. In the case of the Postal Service, risk management can help it, among other things, to protect employees from possible threats in the mail while avoiding unnecessary disruption of operations. Managers at different levels within an agency can engage in risk management decision-making, although the manager of a facility may have more constraints than a higher level manager. Such decision-making can be adversely affected by, among other things, the potential for human errors in judgment and the potentially poor quality of information driving the decisions.

²⁸The risk management approach we have advocated includes fully linking strategic goals to plans and budgets, assessing values and risks of various courses of action as a tool for setting priorities and allocating resources, and using performance measures to assess outcomes. See, for example, GAO, *Homeland Security: Agency Plans, Implementation, and Challenges Regarding the National Strategy for Homeland Security*, GAO-05-33 (Washington, D.C.: Jan. 14, 2005); *Homeland Security: Summary of Challenges Faced in Targeting Oceangoing Cargo Containers for Inspection*, GAO-04-557T (Washington, D.C.: Mar. 31, 2004); *Rail Security: Some Actions Taken to Enhance Passenger and Freight Rail Security, but Significant Challenges Remain*, GAO-04-598T (Washington, D.C.: Mar. 23, 2004); and *Homeland Security: A Risk Management Approach Can Guide Preparedness Efforts*, GAO-02-208T (Washington, D.C.: Oct. 31, 2001).

Within the Postal Service, postal managers and supervisors at facilities play a key role in making an initial assessment of the risks posed by a mail piece, after an employee has identified it as suspicious. The new “SLAP” guidance on identifying suspicious mail, by providing a consistent set of characteristics to look for, will likely help them make these decisions. In addition, the new guidance on initially responding to suspicious mail—including the “three Ps” guidance, related training, and the new response checklist and poster—provides clearer and more consistent instructions on initial steps to take to manage the risk posed by a suspicious mail piece, before postal inspectors or emergency responders become involved. Similarly, the expanded role of postal inspectors in responding to suspicious mail and the Postal Service’s efforts to develop and refine “all-hazards” plans for responding to all types of emergencies will enhance its abilities to manage risk posed to the mail system by biological and chemical agents.

Some Key Elements in USPS Suspicious Mail Guidance Are Lacking

Although USPS’s new guidance on identifying and responding to suspicious mail is clearer and more consistent than the guidance it had in place in October 2003, current guidance does not fully address issues raised by the incident because some key elements are lacking. Specifically, the Postal Service has not provided guidance for employees on response actions to take if a mail piece has characteristics of both suspicious mail and mail containing hazardous material, and the training for managers and supervisors on suspicious mail does not provide all the guidance they may need to make appropriate decisions. Without these elements in its guidance, postal personnel may have difficulty, in some cases, in deciding whether a mail piece is suspicious and whether initial response actions, which can disrupt postal operations, are warranted. Furthermore, the Postal Service has not provided explicit guidance on communicating with employees and unions regarding suspicious mail incidents, including guidance on when information should be provided and to whom and what types of information should be shared. Without such guidance, employees and unions may not receive timely information regarding suspicious mail that is sent for testing and may not feel confident that they have been adequately informed.

USPS lacks guidance on what response actions to take in the event a mail piece has characteristics of both suspicious mail and mail containing hazardous material. The signs employees are trained to look for to identify these types of mail can overlap. For example, a warning label, one characteristic of mail containing or that may contain hazardous material, in

some cases could be considered to be a restrictive marking or a suspicious or threatening message, both characteristics of suspicious mail. The message on the envelope in the Greenville incident (Caution: RICIN POISON. Enclosed in sealed container. Do not open without proper protection.) could be considered to have all of these characteristics. However, neither the current procedures and training on handling mail containing hazardous material nor the procedures and training on suspicious mail clarify what employees should do in such cases.²⁹ Furthermore, while the hazardous material handling procedures in place in October 2003 did indicate that supervisors should request further assistance from the Inspection Service, if necessary after discovering an improperly labeled mail piece suspected of containing hazardous material, the current version of these procedures do not mention calling the Inspection Service in these instances. Notifying the Inspection Service is a key step in the procedures for responding to suspicious mail.

The manager of the office that produces the hazardous material handling procedures and training told us that his office has preferred to focus on the routine handling of mail containing hazardous materials to avoid causing undue concern to employees about this type of mail. However, without clear guidance in these procedures and training that employees should follow suspicious mail procedures when a mail piece has characteristics of both mail containing hazardous material and suspicious mail, employees may be uncertain what to do and their ability to initially assess the risks posed by a mail piece may be impaired. As a consequence, their response actions taken may lack the precautions that are in the suspicious mail procedures. By not taking such precautions, including not handling the mail piece and calling postal inspectors to conduct a threat assessment, employees could unintentionally be exposed to a biological or chemical threat agent if a mail piece did contain one.

USPS training for managers and supervisors on suspicious mail does not provide them with all the guidance they may need to make appropriate decisions. Managers and supervisors at postal facilities play a

²⁹In situations where a mail piece has stains, leakage, or an unusual odor, the hazardous material handling procedures do indicate that employees should follow USPS procedures for hazardous material releases. These characteristics are similar to the following characteristics for suspicious mail: powder on the package or odors, discoloration, or oily stains. USPS's new guidance on suspicious mail also applies to unknown powders or substances leaking from mail and the Postal Service plans to update its hazardous material release procedures to ensure consistency with this new guidance.

key role in judging whether a mail piece is suspicious, after an employee has initially identified it as such, and whether the situation warrants taking the response actions outlined in the new USPS procedures. Such actions can significantly disrupt operations through shutdowns of part or all of a facility. Postal officials have emphasized that they have tried to make this decision process as simple as possible and that postal personnel are experienced in identifying suspicious mail. However, they acknowledge that leaking powder is the most obvious indicator of suspicious mail and that, in the absence of leaking powder, decisions about whether a mail piece is suspicious must be based on other characteristics and can be more difficult to make. While USPS's new guidance on identifying and responding to suspicious mail does apply to scenarios in which a mail piece is leaking as well as to those in which it is not leaking, the training that USPS provides to managers and supervisors on dealing with suspicious mail—the suspicious powder tabletop exercise—does not cover scenarios in which a mail piece is suspicious but not leaking a powder. Suspicious powder incidents have posed a significant challenge to the Postal Service and the purpose of this training has been to ensure a consistent and protective response to these incidents while reducing unnecessary disruption of operations. The suspicious powder tabletop exercise lasts about one hour and USPS required managers and supervisors at facilities with more than 50 staff to complete it in 2003 and again in 2004.

While suspicious powder incidents have comprised the majority of suspicious mail incidents in the last several years, mail that is not leaking but that has other suspicious mail characteristics could also pose a biological threat. According to guidance for local responders issued by the FBI and DHS in November 2004, a “letter/container with a threat but no visible powder or substances present” could have “trace amounts of material present that could represent a health risk.”³⁰ CDC officials told us that, while visible leakage of a powder from a mail piece is a very important factor in determining whether immediate response actions are warranted, a threatening message is also important.³¹

In scenarios in which a mail piece may have one or more characteristics of suspicious mail but does not appear to be leaking a powder, it may be

³⁰FBI-DHS-HHS/CDC, *Guidance on Initial Responses to a Suspicious Letter/Container With a Potential Biological Threat* (Washington, D.C.: November 2, 2004).

³¹CDC has issued guidance on how to recognize and handle a suspicious package or envelope. See <http://www.bt.cdc.gov/agent/anthrax/mail/suspiciouspackages.asp>.

difficult for managers to determine if the mail piece is suspicious and if they should disrupt operations and call the Inspection Service. For example, some of the SLAP characteristics of suspicious mail—such as no return address and excessive postage or tape—may not, by themselves or in combination, indicate potential danger. Also, it may be difficult to determine if a message on the outside of an envelope is suspicious or threatening—another characteristic of suspicious mail—as occurred in the Greenville incident. Judgments about whether a mail piece is indeed suspicious require managers and supervisors to make an initial assessment of the risk posed by a mail piece. In the Greenville incident, the manager decided to end the facility evacuation and to postpone further action until the morning based to a large extent on the fact that the envelope was not leaking. In situations in which a mail piece poses a potential biological threat, whether it is leaking or not, a quick response is important. According to CDC officials, since it is not clear what is inside of a suspicious mail piece, the earlier that response actions are taken, the better.

Finally, although the new poster on responding to suspicious mail indicates that calling the Inspection Service is one of the immediate response actions that should be taken, USPS's suspicious powder training exercise for managers and supervisors does not provide instructions on how soon inspectors should be called after the discovery of a non-leaking suspicious mail piece. As occurred in the Greenville incident, without training that reinforces other guidance about when to call inspectors, managers may wait to call them when in doubt about whether a mail piece is suspicious. Furthermore, in some areas, including Greenville and Charlotte, callers to the Inspection Service after regular business hours are directed to dial a number for live assistance in the event of an emergency. Facility managers may hesitate to do so if there is not clear evidence of an emergency.³² According to postal officials, most mail processing is done from 4:00 p.m. to 8:00 a.m.

USPS lacks explicit guidance on communicating with employees and unions regarding suspicious mail incidents. Other than procedures related to biohazard detection system alerts and other cases of suspected

³²According to the Inspection Service, they are considering ways to increase the availability of inspectors by phone. For example, the service has a national 24-hour phone number for internal reporting of incidents within the Inspection Service and they are considering making this phone number available to postal facilities to call when they discover suspicious mail pieces.

anthrax releases, USPS lacks detailed guidance on communicating with employees and unions regarding suspicious mail incidents, including guidance on when information should be provided and to whom and what types of information should be shared. The Postal Service's draft of its new procedures for responding to suspicious mail which it originally provided to us did not contain guidance on communications with employees and unions. The Postal Service added some guidance on this topic to these procedures after we discussed with them our preliminary findings that it had limited guidance in this area.³³ The new procedures state that supervisors and managers should communicate with employees and local unions about suspicious mail incidents as soon as possible. It also states that information provided "must be limited to known facts," to avoid disseminating unintended misinformation, and that local emergency responders can assist in providing information. While this guidance provides some additional instructions about initial communications, it does not specify how local union organizations should be notified, what types of information should be provided, or whether or when information should be provided after the initial occurrence of the incident, in cases in which mail pieces are sent for testing. Previous guidance, in an e-mail message accompanying the March 2003 decision trees, discussed the need to keep employees and unions informed "at all stages, including the final results and resolution of the incident." However, this guidance has been replaced by the new procedures.

Although Postal Service personnel made a number of efforts to provide information to employees and unions about the October 2003 incident, some issues did arise concerning the timing and method of local union notifications and whether the facility manager should have provided information on symptoms of ricin exposure to facility employees. Furthermore, the lack of formal communications and status updates for employees during the 7 day period from the discovery of the envelope until the results of the testing were shared may have led to rumors and employee concerns. Finally, in our related review of the November 2003 incident in which an envelope containing a substance initially suspected of being ricin was discovered at a White House mail processing facility, we have identified issues related to the Postal Service's subsequent communication of information regarding this incident to employees and unions. We plan to report separately on this incident later this year. The Postal Service's new

³³Postal officials have acknowledged that this new guidance on communications was added as a result of our discussions with them.

procedures for responding to suspicious mail do provide some additional guidance on initially communicating with employees and unions that may help to avoid some of these issues from arising in future incidents.

However, these procedures do not provide explicit instructions that could help to avoid all of these types of issues, particularly in cases where a suspicious mail piece is sent for testing.

According to Inspection Service officials, once inspectors have been alerted about a suspicious mail piece, they often can determine that the item poses no risk through their initial threat assessment, which includes checking the package or envelope or leaking substance and contacting the mailer or addressee. In instances in which, after an initial threat assessment, mail is suspected of containing a biological or chemical agent or other hazardous substance or has a threatening message, such mail pieces are sent for testing to a state or local laboratory and possibly also to CDC.³⁴ A series of tests may be performed to determine whether a threat agent is present. As demonstrated in the Greenville incident, it could take a number of days for testing results to become available. In such instances, employees and unions may become concerned if they are not kept informed on what has transpired and on the status of the testing.

The General Services Administration has issued guidelines for managing biological threats in federal mail facilities that emphasize the importance of communications with local union officials and employees in the event that a threat appears credible.³⁵ Specifically, these guidelines state that all information relevant to such threats should be provided as quickly as possible, preferably without waiting for a request.³⁶ While these guidelines are intended for use by mail centers located in federal agencies, in our view, their recommendations regarding communications with employees and unions are relevant to the Postal Service. In addition, risk communication experts have emphasized that risk information should be

³⁴In fiscal year 2004, according to data maintained by the Inspection Service, about 500 suspicious mail pieces or substances discovered in U.S. Postal Service facilities were either field tested or sent to laboratories to be tested.

³⁵See General Services Administration, *GSA Policy Advisory: National Guidelines for Assessing and Managing Biological Threats in Federal Mail Facilities* (Washington, D.C.: December 29, 2003).

³⁶Occupational Safety and Health Administration standards require employers to disclose exposure-related test results to any employee who requests these results. See 29 CFR 1910.1020 (e) (1) (i).

accurate and clear and provided in a timely fashion to prevent unofficial sources, such as the media, from reporting information before official sources.³⁷

In a previous report on communications issues related to the anthrax incidents, we identified the need for more explicit guidance on communicating facility sampling results to employees as a lessons learned to avoid concerns and maintain trust and credibility.³⁸ We have also previously reported on the need to provide complete and timely health-related information to postal workers to maintain trust and credibility and to help ensure that workers have essential information for making informed health decisions.³⁹ Without specific guidance on communications with employees and unions regarding incidents in which a suspicious mail piece is sent for testing, communications issues may arise in future incidents. Such guidance can clarify the responsibilities of managers at different levels for providing information to employees and unions regarding suspicious mail incidents and help to avoid situations in which efforts by management to communicate information do not meet expectations.

Conclusions

Improvements made by the Postal Service in its suspicious mail guidance since the October 2003 incident should help postal personnel determine whether mail is suspicious and should also help make them more aware of initial actions to take upon identifying suspicious mail. As a consequence, these improvements should enhance the ability of the Postal Service to manage risks posed by potential biological and chemical threats in the mail. However, the lack of additional guidance in some areas could limit the ability of postal personnel to make appropriate decisions in responding to future incidents involving mail that may contain biological or chemical agents. In particular, without guidance on actions to take in cases where a

³⁷GAO, *Homeland Security: Communication Protocols and Risk Communication Principles Can Assist in Refining the Advisory System* [GAO-04-682](#) (Washington, D.C.: June 25, 2004).

³⁸[GAO-03-316](#).

³⁹GAO, *U.S. Postal Service: Issues Associated with Anthrax Testing at the Wallingford Facility*, [GAO-03-787T](#) (Washington, D.C.: May 19, 2003); and *U.S. Postal Service: Clear Communication with Employees Needed before Reopening the Brentwood Facility*, [GAO-04-205T](#) (Washington, D.C.: Oct. 23, 2003).

mail piece has characteristics of both mail containing hazardous material and suspicious mail, employees may follow the procedures for mail containing hazardous material, which do not recommend some precautions in the suspicious mail guidance, such as not handling the mail piece. Furthermore, without training on handling suspicious mail incidents that covers different types of scenarios and how soon inspectors should be called, managers and supervisors may not have all the guidance they need to decide whether a mail piece is suspicious and initial response actions are warranted, and they may delay calling postal inspectors. If a mail piece actually contained a biological or chemical agent, not following the steps in the suspicious mail guidance could result in employees being exposed to the agent.

Finally, the lack of explicit guidance on communicating with employees and unions regarding incidents in which a suspicious mail piece is sent for testing could lead to situations in which employees and unions believe that they have not been adequately informed. Such situations can affect the Postal Service's ability to maintain trust and credibility with employees and unions. In particular, explicit guidance on when information should be provided and to whom and what types of information should be shared would clarify the responsibilities of managers at different levels for providing information and help to avoid concerns by employees and unions.

Recommendations for Executive Action

To help prepare postal personnel to respond to future incidents involving mail that may contain biological or chemical agents, we recommend that the Postmaster General implement the following three recommendations.

- The Postal Service should provide guidance to employees on the response actions to take in the event a mail piece has characteristics of both suspicious mail and mail containing hazardous material.
- The Postal Service should expand its suspicious mail training for managers and supervisors to include
 - exercises for responding to various scenarios involving suspicious mail pieces, including scenarios in which a mail piece is suspicious but is not leaking a powder, and
 - instructions on how soon inspectors should be called after the discovery of a suspicious mail piece.

- The Postal Service should provide explicit guidance to managers on communicating with employees and unions regarding incidents in which a suspicious mail piece is sent for testing. This guidance should specify when information should be provided and to whom and what types of information should be shared.

Agency Comments and Our Evaluation

We requested comments on a draft of this report from the Postal Service, CDC, DHS, the FBI, and the two postal unions that represent employees of the Greenville airmail facility (the American Postal Workers Union and the National Postal Mail Handlers Union). The Postal Service provided written comments generally agreeing with our recommendations. These comments are reprinted in appendix II and are summarized below. The Postal Service also provided some technical comments, which we incorporated. The FBI provided technical comments, which we incorporated, to clarify portions of our draft report that described actions of its Joint Terrorism Task Force in the Greenville area. DHS and CDC had no comments on the draft. The American Postal Workers Union also had no comments and the National Postal Mail Handlers Union did not accept our offer to review the draft.

The Postal Service stated in its overall comments on the draft report that it concurs with the intent of our recommendations and, in response, intends to implement a number of improvements in its suspicious mail guidance, including expanded training for employees. The Postal Service also emphasized that it does not believe such guidance should be unduly specific or detailed. It explained that it believes that the proper approach is to keep instructions to employees relatively basic and general, so that they will be easily understood and applicable to many potential situations. While we understand the Postal Service's rationale for this approach, we also believe that it needs to ensure that its employees have adequate guidance to be able to make appropriate decisions in responding to future incidents involving mail that may contain biological or chemical agents.

Regarding response actions in the event a mail piece has characteristics of both suspicious mail and mail containing hazardous material, the Postal Service told us that it will revise existing guidance to clarify appropriate response actions to take in such scenarios. Regarding its suspicious mail training for managers and supervisors, the Postal Service stated that it will expand and improve this training by adding exercises that include a variety of suspicious mail scenarios, including ones involving mail pieces that are not leaking a powder. It also noted that early contact with the Inspection Service is specified in its new response checklist and that its new training

will stress the need to contact the Inspection Service in any suspicious mail incident. However, it does not plan to impose specific timeframes for calling inspectors, to allow managers and supervisors the flexibility to respond to events as they occur and evolve. While specific timeframes may not be needed, we continue to believe that training for managers and supervisors should reinforce the message in the Postal Service's new guidance that calling the Inspection Service is one of the immediate response actions that should be taken upon the discovery of any suspicious mail piece.

Regarding communications with employees and unions concerning incidents in which a suspicious mail piece is sent for testing, the Postal Service stated that it fully agrees with the concept that timely and accurate communication with employees is vitally important, especially when their safety and health is concerned. It intends to provide additional guidance to local managers regarding their responsibility for providing information, including general guidelines on the types of events that should lead to communication with employees and unions. While we are pleased that the Postal Service plans to provide this additional guidance, we note that its response does not indicate whether this guidance will address situations in which a suspicious mail piece is sent for testing. For such situations, we continue to believe that the Postal Service should specify when information should be provided and to whom and what types of information should be shared. Such explicit guidance could be provided in various ways, including training. Such guidance can help to avoid situations in which efforts by management to communicate information do not meet expectations.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days after its date. At that time, we will send copies of this report to congressional committees and subcommittees with responsibility for postal issues, the Postmaster General, CDC, DHS, the FBI, and the South Carolina Department of Health and Environmental Control, as well as to postal unions and other interested parties. We will provide copies to others upon request. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you have any questions about this report, please contact me at siggerudk@gao.gov or (202) 512-2834. Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this report. Staff who made key contributions to this report are listed in appendix III.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Katherine Siggerud".

Katherine A. Siggerud
Director, Physical Infrastructure Issues

Scope and Methodology

To determine what actions the United States Postal Service (USPS), the Centers for Disease Control and Prevention (CDC) and other agencies took in responding to the October 2003 incident in Greenville, South Carolina, to protect the health of postal employees and the public, we reviewed documents of agencies involved in the response, including timelines, that explained the sequence and timing of actions the agencies took during the response. We also interviewed officials of these agencies and of unions representing workers at the Greenville airmail facility concerning the actions taken to protect the health of postal employees and the public and to discuss reasons for any delays in taking these actions. We obtained pertinent documents and interviewed officials from the following organizations:

- United States Postal Service (USPS) headquarters and Greater South Carolina Area.
- United States Postal Inspection Service (Inspection Service) headquarters and Charlotte, North Carolina office.
- Centers for Disease Control and Prevention (CDC).
- Department of Homeland Security (DHS).
- Federal Bureau of Investigation (FBI) headquarters and Columbia, South Carolina Division.
- South Carolina Department of Health and Environmental Control.
- American Postal Workers Union.
- National Postal Mail Handlers Union.

We developed a timeline of actions taken by the agencies based on the information in agency documents, generally determining the actions of a specific agency from the timeline provided by that agency, and corroborated, to the extent possible, the timeline with information gained from interviews with agency officials.

To determine what USPS guidance for identifying and responding to suspicious mail was in place in October 2003 and to what extent actions taken by USPS personnel were in accordance with this guidance, we reviewed USPS guidance available in October 2003 for identifying and

initially responding to suspicious mail, analyzed this guidance for clarity and consistency, and compared actions taken by USPS personnel with steps in this guidance. In performing this analysis, we also reviewed related USPS procedures and guidance for identifying, handling and responding to hazardous materials in the mail and USPS guidance on actions to take during emergencies. We also reviewed USPS guidance on communicating with employees and unions that could pertain to suspicious mail incidents and compared USPS's actions to communicate with employees and unions with its existing guidance on such communication. We also interviewed local and national officials from USPS and postal unions about suspicious mail and other related guidance, actions taken during the response, and communication with employees and the unions about the incident. We used information from the interviews to further understand and clarify USPS guidance and actions taken during the response.

To determine what changes USPS has made in its guidance since the incident and to what extent current USPS guidance addresses issues raised by the incident, we reviewed current USPS guidance related to suspicious mail and communicating with employees and the unions about suspicious mail incidents, and compared it to guidance available during the incident to identify changes and the extent to which improvements have been made that address issues raised by the incident. To assist in evaluating USPS suspicious mail guidance, we also reviewed guidance developed by CDC, DHS, the General Services Administration and others on mail security and responding to biological threats in the mail and reports of the USPS Office of the Inspector General related to suspicious mail. We reviewed previous GAO work on risk management and risk communication, as well as some other pertinent literature, and compared this information with USPS guidance to determine whether they incorporated a risk management or risk communication approach in their guidance. We also reviewed previous GAO work on USPS's response to anthrax to obtain a broader perspective on how USPS has responded to risks posed by biological threats in the mail system. In addition, we interviewed USPS officials concerning how USPS's suspicious mail guidance was developed, plans for updating or revising current guidance and developing new guidance, and how USPS used risk management in the development of its guidance. We also interviewed officials from the American Postal Workers Union and the National Postal Mail Handlers Union about USPS communication with employees and unions during suspicious mail incidents. Finally, we reviewed scientific literature on ricin and interviewed experts in CDC and the U.S. Army Medical Research Institute of Infectious Diseases to determine the

potential health risks associated with ricin or other biological or chemical agents in the mail system.

We limited the suspicious mail guidance we reviewed to those pertaining to the initial discovery of a suspicious mail piece until the point when the mail piece is removed from the facility. We also limited the comparison of actions USPS took with suspicious mail guidance to actions taken from the initial discovery through the removal of the envelope from the facility, except for communication with employees and unions, which we covered until final results of testing of the envelope and its contents were available. We did not review the Postal Service's implementation of its biohazard detection systems or related procedures, other than aspects of these procedures that pertained to communications with employees and unions. We did not review the communication among all involved agencies or with emergency responders or the public. We also did not review the procedures of other agencies or of the Inspection Service. Finally, we did not review the capability of the Inspection Service or other agencies to conduct initial threat assessments or actions relating to the investigation of this incident.

We performed our work from June 2004 through May 2005 in Washington, D.C.; Greenville, South Carolina; Columbia, South Carolina; Charlotte, North Carolina; and Atlanta, Georgia. We conducted our review in accordance with generally accepted government auditing standards.

Comments from the U.S. Postal Service

THOMAS G. DAY
SENIOR VICE PRESIDENT, GOVERNMENT RELATIONS



June 28, 2005

Ms. Katherine A. Siggerud
Director, Physical Infrastructure Issues
United States Government Accountability Office
Washington, DC 20548-0001

Dear Ms. Siggerud:

Thank you for providing U.S. Postal Service with the opportunity to review and comment on your draft report, [U.S. Postal Service: Guidance on Suspicious Mail Needs Further Refinement](#).

We concur with the intent of the report's recommendations. As you are aware, the Postal Service continuously strives to refine and strengthen our responsive actions regarding any mail which is suspected of having the potential to cause harm to our employees or others, and we therefore appreciate any suggestions concerning improvements we can make to our guidance and training to our employees in this regard. We also fully agree with the concept embodied in your recommendations that timely and accurate communication with our employees is vitally important, especially when their safety and health are concerned.

However, to the extent the recommendations can be read to require the Postal Service to issue guidance which is unduly specific or detailed, the Postal Service disagrees with that approach. In formulating our practices and policies for responding to "suspicious mail" and the guidance and training related thereto, we have remained mindful of the multitude of potential events and permutations of those events which our employees may face. Keeping all of the potential variations in mind, it is simply not possible to design a detailed set of specific, hard and fast rules that will help our employees to respond to all potential situations and also give them the flexibility necessary to react to events as they occur and evolve. We have therefore been careful not to design any response plans that are too specific and inflexible.

Instead, we have tried to keep our instructions to our employees relatively basic and general, so that they will be easily understood by our employees and widely applicable to the many potential situations they may face. We instruct employees to evaluate four characteristics of an individual item of mail to determine if it is suspicious – Shape, Look, Address and Packaging. If a mail item is judged to be suspicious based upon these characteristics, then we have chosen to implement a simplified and easily understood set of guidelines that emphasizes the safety of our employees and reliance upon the expertise of Postal Inspectors and local first responders. If a suspicious item of mail is identified, employees have been instructed to follow three simple steps: (1) Don't handle. Isolate it; (2) Clear the area of people, notify supervisor; and, (3) Contact the Inspection Service and follow your facility emergency plan. We continue to believe that this is the proper approach.

That being said, the following paragraphs provide the current status and planned approach for addressing each of the report's recommendations:

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Appendix II
Comments from the U.S. Postal Service

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Recommendation 1:

The Postal Service should provide guidance to employees on the response actions to take in the event a mail piece has characteristics of both suspicious mail and mail containing hazardous material.

We concur with this recommendation. The Postal Service will continue to work to refine and clarify response actions associated with suspicious mail and mail containing hazardous materials, and we will emphasize the appropriate response actions to take with regard to mail containing characteristics of both suspicious and hazardous mail in all planned revisions to existing guidance. We want to keep our employees safe and to insure that they know how to respond to any suspicious mail scenario.

Recommendation 2:

The Postal Service should expand its suspicious mail training for managers and supervisors to include:

Exercises for responding to various scenarios involving suspicious mail pieces, including scenarios in which a mail piece is suspicious but is not leaking a powder and

Instructions on how soon inspectors should be called after the discovery of a suspicious mail piece.

We concur with your recommendation concerning our training exercises, and will expand and improve our training by utilizing exercises that include a variety of suspicious mail scenarios, including ones involving mail items that are not leaking powder. Again, our primary interest is to keep our employees safe. Training that we are developing which will include a greater variety of suspicious mail scenarios will include: (1) a web-based training that we are developing which will be completed by the end of this fiscal year and that will be delivered to both supervisors/managers and craft employees beginning in the fall of 2005; (2) a supplemental paper-based program that will be issued by Emergency Preparedness in conjunction with Employee Resources and Development; and, (3) a video that is being developed by the Inspection Service that will be included with the paper-based program.

Further, we will modify the current tabletop exercises on suspicious mail to incorporate additional suspicious mail situations, including ones involving mail items that are not leaking powder. The current tabletop exercises are slated to be revamped so that we can deliver them in the fall of 2005.

With regard to the recommendation concerning the timeframe for contacting the Inspection Service, as we noted above, early contact with the Inspection Service so that we can rely on their expertise is an important component of the guidance we provide to our employees for responding to suspicious mail. Indeed, this component is specifically addressed in the checklist that is being sent to all Executive and Administrative Schedule (EAS) employees at their homes. Additionally, we will also insure that all of the training noted above will likewise stress the need to contact the Inspection Service in any suspicious mail incident.

However, to the extent this recommendation seeks to impose a specific, inflexible time frame in which to call the Inspection Service after the discovery of a suspicious mail item, it is not consistent with the philosophy of our guidance. As noted above, our guidance is designed to allow our supervisors and managers the flexibility to respond to individual and fact-specific events that they are confronting as those events occur and evolve.

Appendix II
Comments from the U.S. Postal Service

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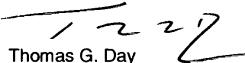
Recommendation 3:

The Postal Service should provide explicit guidance to managers on communicating with employees and unions regarding incidents in which a suspicious mail piece is sent for testing. This guidance should specify when information should be provided and to whom and what types of information should be shared.

As noted above, the Postal Service agrees that timely and accurate communication with our employees is vitally important, especially when their safety and health is concerned. However, to the extent the recommendations can be read to require the Postal Service to issue guidance which is unduly specific or detailed, the Postal Service disagrees with that approach for the reasons noted above. The Postal Service will provide additional guidance to ensure that local management understands its responsibility for providing information to employees. While we do not believe that establishing a specific set of circumstances that determine how and when communication with employees is required, we will provide general guidelines concerning the type of events that should lead to communication with employees and the unions that represent them.

If you or your staff wishes to discuss any of these comments further, I am available at your convenience.

Sincerely,


Thomas G. Day

Contact and Staff Acknowledgments

Contact

Katherine Siggerud, (202) 512-2834 or siggerudk@gao.gov.

Staff Acknowledgments

In addition to the above, Susan Fleming, Assistant Director; Heather Balent; Colin Fallon; Scott Farrow; Judy Guilliams-Tapia; Daniel Kaneshiro; Jamie Meuwissen, and Matthew Mohning made key contributions to this report.

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